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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re: : Chapter 11 Case No.
: :
LEHMAN BROTHERS HOLDINGS INC., et al. : 08-13555 (JMP)
: :
Debtors. : (Jointly Administered)

**RESPONSE OF AVIGNON CAPITAL LTD. TO DEBTORS'
ONE HUNDRED SEVENTIETH OMNIBUS OBJECTION TO
CLAIMS (NO BLOCKING NUMBER LPS CLAIMS)**

Avignon Capital Ltd. (the "Claimant"), by and through its undersigned counsel, hereby files this response (the "Response") with respect to proof of claim number 62725, as amended by proof of claim number 67697 (the "LBHI Claim"), to the Debtors' One Hundred Seventieth Omnibus Objection to Claims (No Blocking Number LPS Claims) [Docket No. 19388] (the "Objection"), filed by the above-captioned debtors and debtors-in-possession on August 19, 2011 and respectfully represents as follows:

BACKGROUND

1. Beginning on September 15, 2008 (the "Petition Date") and periodically thereafter, Lehman Brothers Holdings Inc. ("LBHI") and certain of its subsidiaries (together with LBHI, the "Debtors") filed voluntary petitions for relief under chapter 11 of title 11 of the United States Code, 11 U.S.C. §§ 101-1532 *et seq.* (the "Bankruptcy Code"), in the United States

Bankruptcy Court for the Southern District of New York (the "Court").

2. On September 19, 2008 (the "SIPA Filing Date"), the United States District Court for the Southern District of New York entered the Order Commencing Liquidation pursuant to the provisions of the Securities Investor Protection Act of 1970, as amended ("SIPA") with respect to Lehman Brothers Inc. ("LBI").

I. The LBI Claim

3. On November 7, 2008, the Court entered its Order Approving Form and Manner of Publication and Mailing of Notice of Commencement; Specifying Procedures and Forms for Filing, Determination and Adjudication of Claims; Fixing a Meeting of Customers and Creditors; and Fixing Interim Reporting Pursuant to SIPA [Case No. 08-01420 (JMP), Docket No. 241], which set (a) January 30, 2009 as the bar date for receiving the maximum possible protection for customer claims under SIPA and (b) June 1, 2009 as the bar date for all proofs of claim to be filed against LBI.

4. On or about January 19, 2009, Central Banco Universal filed a customer claim (the "LBI Customer Claim") against LBI, seeking the return of all of its assets held in LBI Account No. 940-90706 (the "LBI Account") as of the SIPA Filing Date. The Customer Claim sought, among other things, the return of the securities ISIN XS0336336960, XS0366314226 and XS0366401031 (collectively, the "Securities").

5. On or about January 6, 2010, James W. Giddens, Trustee for the SIPA Liquidation of Lehman Brothers Inc. (the "LBI Trustee") issued a Notice of Trustee's Determination of Claim (the "LBI Notice") in which the LBI Trustee "allowed" the LBI Customer Claim with respect to the Securities, recognizing that the Securities were held by LBI for Central Banco Universal as of the SIPA Filing Date. The LBI Notice is attached hereto as Exhibit A (claim information unrelated to this Objection has been redacted).

6. Claimant holds the Securities pursuant to an assignment agreement attached hereto as Exhibit B (the "Assignment Agreement"). Claimant has submitted to the LBI Trustee a Declaration, Release and Assignment (the "Release") with respect to the LBI Notice, as required before it will be entitled to any distributions from LBI. The Release is attached hereto as Exhibit C. To date, the LBI Trustee has not returned the Securities to Claimant.

II. The LBHI Claim

A. LBHI Bar Date Order

7. On July 2, 2009, the Court entered its Order Establishing the Deadline for Filing Proofs of Claim, Approving the Form and Manner of Notice Thereof and Approving the Proof of Claim Form (the "LBHI Bar Date Order") [Docket No. 4271]. The LBHI Bar Date Order provided procedures for the "filing of any and all claims (including any claims under a related Guarantee) against the Debtors arising from securities issued by the Debtors or any of the Debtors' affiliates outside of the United States, solely to the extent identified on <http://www.lehmandocket.com> under the heading 'Lehman Programs Securities' (any such security, a 'Lehman Program Security')." LBHI Bar Date Order at 12. The LBHI Bar Date Order established November 2, 2009 as the deadline for each person or entity to file proofs of claim based on any Lehman Program Security (the "LPS Bar Date"). The Securities were classified as Lehman Programs Securities on the Debtors' website.

8. The LBHI Bar Date Order required that each proof of claim based on a Lehman Program Security include "either a Euroclear electronic instruction reference number or a Clearstream blocking reference number" (each a "Blocking Number"). *Id.* at 13. The LBHI Bar Date Order also authorized the Debtors to publish a Notice Regarding Deadline for Filing Proofs of Claim Based on Lehman Programs Securities (the "LPS Bar Date Notice"). The LPS Bar Date Notice provides, in a section titled "Special Note Regarding Blocking Numbers," as

follows:

Beneficial holders (which includes most individuals) of Lehman Programs Securities that are not Euroclear Bank ("Euroclear"), Clearstream Bank ("Clearstream") or other depository account holders may not contact Euroclear, Clearstream or such other depository directly [in order to obtain a Blocking Number]. Such holders must direct their accountholder (i.e. the bank, broker or other entity that holds such securities on behalf of such beneficial holder) to contact Euroclear, Clearstream or other relevant depository to obtain the Blocking Number.

LPS Bar Date Notice at 3.

B. Claimant's Painstaking Efforts to Obtain the Blocking Numbers

9. Well in advance of the LPS Bar Date, as set out below and in the Declarations (as defined below), Claimant through its counsel repeatedly and diligently attempted to obtain Blocking Numbers from LBI and several other depositories where Claimant suspected LBI maintained accounts. Notwithstanding the many attempts made to gather this information, Claimant was unable to even locate someone at LBI, which was undoubtedly focused on its own wind-down, who could apply for and obtain Blocking Numbers for Claimant. Claimant took the next steps and attempted to reach out to clearing agencies directly on behalf of LBI to obtain Blocking Numbers but, as expected, was informed that only the depository -- LBI -- would be able to obtain that information. After making many phone calls and reaching out to LBI's counsel as well as the Debtors' counsel for assistance, Claimant was still unable to locate anyone at LBI or elsewhere who would assist it in obtaining Blocking Numbers.¹

¹ Additional description of the efforts taken to obtain the Blocking Numbers is set forth in the Declaration of Lara Aryani dated as of October 27, 2011 (the "Aryani Declaration") and the Declaration of Christy Rivera dated as of October 27, 2011 (the "Rivera Declaration") and, together with the Aryani Declaration, the "Declarations"). The Aryani Declaration is attached hereto as

(Cont'd on following page)

10. Accordingly, on or about November 2, 2009, the LBHI Claim based in part on the Securities was timely filed² with Epiq Bankruptcy Solutions, LLC, the Debtors' claims agent, without the Blocking Numbers, but instead with a detailed and comprehensive explanation included therein noting Claimant's persistent, but ultimately (through no fault of Claimant or its counsel) unsuccessful, attempts to obtain that information.

III. Objection to LBHI Claim and Notice of Proposed Allowed Claim Amount

11. On August 19, 2011, the Debtors filed the Objection, in which the Debtors seek to disallow and expunge the LBHI Claim with respect to the Securities, solely on the basis that valid Blocking Numbers are not referenced.

12. On or about August 24, 2011, Claimant received the Debtors' Notice of Proposed Allowed Claim Amount (the "Notice"), delivered pursuant to the Order Approving Procedures for the Determination of the Allowed Amount of Claims Filed Based on Structured Securities Issued or Guaranteed by Lehman Brothers Holdings Inc. (the "LPS Procedures Order") [Docket No. 19120], which provided procedures for determining the allowed amount of claims based on Lehman Programs Securities (as defined in the LPS Procedures Order).

13. The Notice recognizes that the Maximum Allowable Amount for the

(Cont'd from preceding page)

Exhibit D, and the Rivera Declaration is attached hereto as Exhibit E. All information included in the Declarations is incorporated by reference in this Response.

² Proof of claim number 62725 was filed on or about November 2, 2009. An amended claim referencing the Securities was filed on October 23, 2011 and has been assigned proof of claim number 67697.

Securities is \$13,353,776.66.³ However, solely because Claimant was unable to obtain Blocking Numbers for the Securities from LBI, the Debtors value the LBHI Claim with respect to the Securities at \$0.

RESPONSE

14. Claimant challenges the Debtors' Objection to the LBHI Claim based on the lack of Blocking Numbers, given Claimant's careful, conscientious and persistent efforts to obtain such Blocking Numbers and Claimant's inability to do so through no fault of its own.

I. Compelling Circumstances Require the Debtors to Disregard the Absence of Blocking Numbers in this Instance

15. Bankruptcy courts are guided by principles of equity "to insure that 'fraud will not prevail, that substance will not give way to form, that technical considerations will not prevent substantial justice from being done.'" In re Integrated Resources, Inc., 157 B.R. 66, 70 (S.D.N.Y. 1993) (citations omitted). See, e.g., Firearms Import and Export Corp. v. United Capitol Ins. Co. (In re Firearms Import and Export Corp.), 131 B.R. 1009, 1017 (Bankr. S.D. Fla. 1991) ("[C]reditor need not file a letter perfect proof of claim before the expiration of the bar date to preserve its claim."). Inconsequential technical omissions that are in no way the fault of the Claimant should not result in otherwise meritorious proofs of claim being expunged; such a result is simply too harsh and unwarranted for timely filed proofs of claim that comply with the Bankruptcy Code and the Federal Rules of Bankruptcy Procedure. Any other rule would in this case be plainly absurd as Claimant cannot be asked to do the impossible.

³ Claimant objected to the Proposed Allowed Claim Amount, as provided in the Notice, on November 8, 2011.

A. Blocking Numbers Were Required Simply as Evidence of Ownership

16. The Debtors have stated that the purpose of requiring claimants to obtain Blocking Numbers was to prevent the underlying securities from being traded through the period ending November 2, 2009, and to enable the Debtors to confirm ownership and the amount of a particular security. See Hearing Transcript for Debtors' Twenty-Ninth Omnibus Objection to Lehman Program Securities Claims With No Blocking Number ("Transcript") at 15:13-21 (Oct. 27, 2010) ("A security could have been traded every day for thirty days prior to the bar date and each holder could have filed the claim risking duplicative and/or excessive distributions. The blocking number requirement was specifically designed to address this problem. The blocking number, when issued, would confirm ownership and amount of a security as of a certain date and, once it was issued, trading for that particular security was frozen through the securities program bar date."). In the 170th Omnibus Objection, the Debtors noted:

The issuance of a Blocking Number prevented the holder of a Lehman Program Security from trading that security through November 2, 2009 The Blocking Number requirement was necessary because the Lehman Programs Securities did not have an indenture trustee that would file a global claim on behalf of all holders of a particular security, but rather individual holders of such securities (or custodians thereof) would be filing claims based on such securities. Accordingly, the blocking number requirement provided the only mechanism for the Debtors to confirm the ownership and amount of a particular security for purposes of the proof of claim based on a Lehman Program Security. Absent the blocking number requirement and temporary restriction on trading, the risk would exist that the Debtors would make distributions in excess of the outstanding amount of the Lehman Programs Securities and multiple distributions on the same obligation.

170th Omnibus Objection at ¶10-11.

17. In In re Lehman Brothers Holdings Inc., 433 B.R. 113, 127 (Bankr. S.D.N.Y. 2010), the Court recognized that in "truly unusual and compelling circumstances," noncompliance with the LBHI Bar Date Order should not result in a claim's expungement. See

also Transcript at 38:18-39:1 (allowing two of three claims that failed to provide blocking numbers, explaining that "good faith attempts to comply [with the Blocking Number requirement] . . . can lead to an excuse [T]hey win on particularized facts and I don't think that opens the door").

B. Claimant Has Provided Ample and Indeed Dispositive Evidence of Ownership

18. Here, Claimant is clearly able to provide the Debtors with confirmation that Claimant owns the Securities. The Securities were held in an account at LBI as of the SIPA Filing Date. On that date, LBI was placed into a SIPA liquidation with a court-appointed fiduciary -- the LBI Trustee -- to oversee the orderly wind-down of the LBI estate. The LBI Trustee, in his court-appointed role and in accordance with SIPA procedures, has provided Claimant with the LBI Notice, confirming that the Securities were to be held in the LBI Account as of the SIPA Filing Date. As the Debtors and the Court are aware, a stay is in place in the LBI SIPA proceeding, which has effectively prevented Claimant from transferring its Securities out of the LBI Account after the SIPA Filing Date. The purpose of the Blocking Numbers was to freeze trading of the Lehman Programs Securities. Goal accomplished. Accordingly, the LBI Notice, Assignment Agreement and related Release provide the Debtors with the requisite evidence of Claimant's ownership of the Securities.

C. Claimant Attempted in Good Faith to Comply with the LBHI Bar Date Order

19. As noted above, Claimant attempted in good faith to comply with the LBHI Bar Date Order. This is not a case where Claimant simply ignored a requirement or failed to take steps to comply. To the contrary, Claimant's record is one of persistent effort to obtain Blocking Numbers. Claimant, through its counsel, repeatedly and diligently tried to obtain Blocking Numbers from multiple possible sources and ultimately filed the LBHI Claim without

Blocking Numbers only after all its efforts to obtain them were thwarted. The fact that the entity which needed to apply for the Blocking Numbers, LBI, was subject to its own insolvency proceeding clearly caused significant problems with this process. This situation clearly fits within the type of "compelling circumstances" contemplated by the Court that justify overlooking the absence of Blocking Numbers.

**D. The Bankruptcy Code and the Bankruptcy Rules
Support Allowance of the LBHI Claim**

20. The basis for the Objection does not fall within one of the enumerated grounds for claim disallowance as set forth in Bankruptcy Code section 502(b) of the Bankruptcy Code. Section 502, which governs the allowability of claims, provides that a properly filed claim is deemed allowed unless a party-in-interest objects to such claim. See 11 U.S.C. § 502(a). If such objection is made, then the claim will be allowed "except to the extent that" the claim implicates any of nine identified exceptions. See 11 U.S.C. § 502(b). Of these nine standards of allowability, only two sections of the Bankruptcy Code can arguably be called into question here: Bankruptcy Code section 502(b)(1), which provides that the "claim is unenforceable against the debtors . . . under any agreement or applicable law for a reason other than because such claim is contingent or unmatured"; and Bankruptcy Code section 502(b)(9), which provides that a "proof of such claim is not timely filed" 11 U.S.C. § 502(b)(9).

21. Section 502(b)(1), in effect, makes available any defense to a claim that might have been available to the debtor under applicable nonbankruptcy law. See Travelers Cas. & Surety Co. of Am. v. Pac. Gas & Electr. Co., 549 U.S. 443, 450 (2007). These defenses generally prevent the assertion of an unjust claim against the estate. See 4 COLLIER ON BANKRUPTCY ¶ 502.03[2][b] (16th ed. 2010). Based on the facts presented in the Objection, the exception set forth in § 502(b)(1) does not apply to the LBHI Claim. The failure to obtain

Blocking Numbers is not a defense to payment on the Securities under any principle or rule of applicable nonbankruptcy law, and the Debtors do not even claim it is.

22. Section 502(b)(9) addresses timeliness of proof of claims filings, rather than substantive matters relating to the validity of the underlying claim. See COLLIER ON BANKRUPTCY ¶ 502.03[10] ("This provision was designed to overrule case law holding that tardily filed claims were allowable."). Again, the exception to the allowability of a claim provided in § 502(b)(9) is not implicated because (i) the Objection does not challenge the LBHI claim as being untimely filed and (ii) in fact, the LBHI Claim was timely filed.

23. The Federal Rules of Bankruptcy Procedures (the "Bankruptcy Rules") also support Claimant's argument that the LBHI Claim should be allowed. Bankruptcy Rule 3001(a) provides that a valid proof of claim must include a "written statement setting forth a creditor's claim . . . [and] shall conform substantially to the appropriate Official Form." FED. R. BANKR. P. 3001(a). A proof of claim, once executed and filed in accordance with Rule 3001, "constitute[s] prima facie evidence of the validity and amount of the claim." Id. 3001(f). Bankruptcy Rule 3001(a) does not indicate that the "conform substantially" language was intended to permit Debtors to impose additional requirements on creditors. Instead, the "conform substantially" language was intended to provide protections in favor of creditors and in favor of the allowance of claims. See In re Stoecker, 5 F.3d 1022, 1026-28 (7th Cir. 1993) (limiting the broad application of Rule 3001 by refusing to permit the disallowance of a claim for "hypertechnical" reasons).

24. The Debtors rely on a procedural device in seeking to disallow the LBHI Claim. Nothing in Bankruptcy Code section 502 or Bankruptcy Rule 3001 supports such action by the Debtors, especially in light of the fact that Claimant's persistent efforts to obtain Blocking Numbers were unsuccessful solely because of circumstances entirely outside of Claimant's

control.

E. The Debtors Are Not Prejudiced by Allowance of the LBHI Claim

25. Claimant's inability to obtain Blocking Numbers has not prejudiced the Debtors, nor has the purpose of the Blocking Number system been frustrated or in any way compromised. In the case of the Securities, there is simply no risk that Debtors will make multiple distributions, as Claimant has been the beneficiary of the Securities at all relevant times. While the Blocking Number system may play a useful role in the Debtors' claims reconciliation process, it is not appropriate for this requirement to be mechanically applied to the prejudice of entirely valid claims, with no regard for exceptional circumstances.

26. The Debtors are likely to argue that allowing proofs of claim that do not include Blocking Numbers will open the floodgates to such claims and compromise the orderly reconciliation of claims. This argument cuts both ways. Allowing the Debtors to expunge claims based on a technical requirement of the LBHI Bar Date Order that finds no basis in the Bankruptcy Code or Bankruptcy Rules would permit the Debtors to escape liability for substantially valid claims that were duly and properly filed before the LPS Bar Date and that recite on their face Claimant's extraordinary efforts to obtain Blocking Numbers. The interests of bona fide creditors who have made good faith and timely efforts to comply with the LBHI Bar Date Order should be far more compelling than the Debtors' supposed interest in rigorous adherence to technical claims procedures. Moreover, Claimant's predicament when trying to obtain Blocking Numbers falls within the category of "unusual" circumstances that justify overlooking the LBHI Bar Date Order's requirement to submit Blocking Numbers. There are clearly a finite number of creditors who can argue that they were unable to obtain Blocking Numbers because the custodian of the relevant securities was subject to its own insolvency proceeding.

27. Even if the LBHI Claim were found to be deficient, it should at the very least qualify as an "informal" proof of claim. "The informal proof of claim is an equitable principle developed by courts to alleviate the harsh results of strict enforcement of the bar date." Houbigant, Inc. v. ACB Mercantile, Inc. (In re Houbigant, Inc.), 190 B.R. 185, 187 (Bankr. S.D.N.Y. 1995). An informal proof of claim requires only that it (1) be timely filed and made part of the judicial record; (2) state the existence and nature of the debt; (3) state the amount of the claim; and (4) evidence an intent to hold the debtor liable for the claim. See, e.g., In re Enron Creditors Recovery Corp., 370 B.R. 90, 99 (Bankr. S.D.N.Y. 2007); In re Drexel Burnham Lambert Group, Inc., 129 B.R. 22, 26 (Bankr. S.D.N.Y. 1991); see also In re Hanscom Retail Foods, Inc., 96 B.R. 33, 36 (Bankr. E.D. Pa. 1988) ("Since the purpose of a proof of claim is for the creditor to put the estate on notice of its demand against the estate and its intention to hold the estate liable, this purpose is met so long as the nature of the claim . . . is clearly and timely announced.") (internal citation omitted).

28. Here, the LBHI Claim undoubtedly satisfies the elements of an informal proof of claim. Indeed, it is in form and substance a perfectly proper formal proof of claim, lacking only Blocking Numbers that Claimant could not obtain despite persistent efforts to do so. Claimant provided the Debtors with an explicit demand setting forth the nature and amount of the claim, as well as Claimant's intent to hold the Debtors liable, and a detailed explanation of its efforts to obtain the Blocking Numbers. The Debtors have been sufficiently alerted to their obligation regarding the LBHI Claim and, as evidenced in the LBHI Claim and herein, the substantive need underlying the requirement to provide the Blocking Numbers has been met, notwithstanding the inability of Claimant to obtain them from LBI.

CONCLUSION

WHEREFORE, for the reasons set forth in the Response, Claimant respectfully requests that the Court (i) deny the Objection as it relates to the LBHI Claim and (ii) grant such other and further relief as the Court deems just and proper.

Date: New York, New York
November 11, 2011

CHADBOURNE & PARKE LLP

By: /s/ David M. LeMay
David M. LeMay

A Member of the Firm
30 Rockefeller Plaza
New York, New York 10112
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Counsel to Avignon Capital Ltd.

EXHIBIT A

James W. Giddens
Trustee for the SIPA Liquidation of Lehman Brothers Inc.
c/o Epiq Bankruptcy Solutions, LLC
757 Third Avenue, 3rd Floor
New York, NY 10017

***In re* Lehman Brothers Inc.**

Case No. 08-01420 (JMP) SIPA

NOTICE OF TRUSTEE'S DETERMINATION OF CLAIM

January 6, 2010

VIA UPS OVERNIGHT

CENTRAL BANCO UNIVERSAL
ATTN: ROBERT J GAYDA ESQ
CHADBOURNE & PARKE LLP
30 ROCKEFELLER PLAZA
NEW YORK, NY 10112

Re: Claim Number(s): 900003116
900003115 (Duplicate of claim 900003116)
Account Number(s): 94090706

Dear Claimant:

PLEASE READ THIS NOTICE CAREFULLY

The liquidation of the business of Lehman Brothers Inc. is being conducted by James W. Giddens (the "Trustee") under the Securities Investor Protection Act of 1970, as amended ("SIPA"), pursuant to an order entered on September 19, 2008 by the United States District Court for the Southern District of New York. You have submitted the above-referenced claim(s) (the "Claim") as a customer claim in this proceeding. This Notice is applicable only to the claim(s) and/or accounts identified above. If you filed other claims, additional notices will be issued.

The Trustee has made the following determination regarding your Claim:

Your Claim is **ALLOWED** as a net equity claim for securities in the following amount:

Name of Security	CUSIP #/ISIN #	Number of Shares
Lehman Brothers Treasury Euro Medium Term Note Due 12/20/2008	XS0336336960	1,500,000.00
Lehman Brothers Treasury Euro Medium Term Note 5/28/2009	XS0366314226	550,000.00
Lehman Brothers Treasury Euro Medium Term Note 5/28/2009	XS0366401031	50,000,000.00
████████████████████	██████████	██████████

Your Claim for cash is DENIED because your claim for cash included the value of the above listed securities, which are being allowed as a net equity claim for securities pursuant to SIPA.

RECEIPT BY THE TRUSTEE OF A DULY EXECUTED DECLARATION, RELEASE AND ASSIGNMENT IN THE FORM ATTACHED HERETO (the "Release") IS REQUIRED FOR RECEIVING DISTRIBUTIONS OF ALLOWED CLAIMS WHEN THEY BEGIN. Distributions will be made in proportion to a claimant's share of available customer property and will be made based on the Trustee's best estimate of available customer property at the time of distribution, and may in some instances include cash in lieu of securities in accordance with SIPA. Distribution may take place in multiple installments over time and will require coordination with and cooperation from various third party custodians, which may delay some or all transfers. Distribution of customer name securities will be made in accordance with SIPA. Please note, no determination is being made as to the validity or allowed amount of any amounts you may have claimed for cash and/or securities, if any, received by the Trustee after September 19, 2008. Such property is not part of the net equity calculation, and the determination of any such claim will be dealt with separately in the Trustee's continuing administration of the estate.

If you accept the Trustee's determination, please sign, date, and have notarized the enclosed Release, and return it to us at your earliest convenience. We recommend that you retain a copy

for your records. **PLEASE NOTE THAT THE RELEASE REQUIRES YOU TO CONFIRM TO THE TRUSTEE, UNDER PENALTY OF PERJURY, THAT YOU HAVE NOT RECEIVED ANY PAYMENTS OR TRANSFERS OF THE ALLOWED SECURITIES AND/OR THE ALLOWED CASH THROUGH THE DATE OF THE RELEASE.** Kindly provide instructions for the transfer of securities and cash on the form provided. To expedite the distribution process, we recommend that you provide email addresses for you and your broker dealer. Upon receipt of the duly executed Release, a Trustee representative will contact you and your new broker to facilitate the transfer of the Allowed Securities and the Allowed Cash to your new brokerage account. Completed releases must be sent to the following address:

Epiq Bankruptcy Solutions LLC
757 Third Avenue, Ste. 302
New York, New York 10017-2063

PLEASE TAKE NOTICE: If you disagree with this determination and desire a hearing before Bankruptcy Judge James M. Peck, you **MUST** file your written opposition, setting forth (i) the claim number; (ii) a detailed statement of the reasons for your objection to the Trustee's determination; (iii) copies of any document or other writing upon which you rely; and (iv) mailing, phone, and email contact information, with the United States Bankruptcy Court and the Trustee within **THIRTY DAYS** of the date of this notice.

PLEASE TAKE FURTHER NOTICE: If you do not properly and timely file a written opposition, the Trustee's determination with respect to your claim will be deemed confirmed by the Court and binding on you.

PLEASE TAKE FURTHER NOTICE: If you properly and timely file a written opposition, a hearing date for this controversy will be obtained by the Trustee and you will be notified of that hearing date. Your failure to appear personally or through counsel at such hearing will result in the Trustee's determination with respect to your claim being confirmed by the Court and binding on you.

PLEASE TAKE FURTHER NOTICE: You must file your opposition in accordance with the above procedure electronically with the Court on the docket of *In re* Lehman Brothers Inc., Case No. 08-01420 (JMP) SIPA in accordance with General Order M-242 (available at www.nysb.uscourts.gov/orders/orders2.html) by registered users of the Court's case filing system and by all other parties in interest on a 3.5 inch disk, preferably in Portable Document Format (PDF), Microsoft Word or any other Windows-based word processing format.

If you do not have means to file your opposition electronically, you may mail your opposition to:

Clerk of the United States Bankruptcy Court
Southern District of New York
One Bowling Green
New York, New York 10004

PLEASE TAKE FURTHER NOTICE: You must serve your opposition upon the Trustee's counsel by mailing a copy to:

Hughes Hubbard & Reed LLP
One Battery Park Plaza
New York, NY 10004
Attn: LBI Hearing Request

Attorneys for James W. Giddens, Trustee for
the SIPA Liquidation of Lehman Brothers Inc.

Very Truly Yours,

James W. Giddens
Trustee for the SIPA Liquidation of
Lehman Brothers Inc.

EXHIBIT B

Execution Copy

ASSIGNMENT AGREEMENT

This ASSIGNMENT AGREEMENT is entered into as of July 27, 2009 (this "Agreement"), by and between C.A. CENTRAL BANCO UNIVERSAL, a financial institution organized and existing under the laws of Venezuela domiciled in Torre Central, Avenida Venezuela, between Avenida Argimiro Bracamonte and Avenida Los Leones, in the city of Barquisimeto, Estado Lara, originally registered in the First Commercial Registry of the Judicial Circumscription of the State of Lara on October 29, 2001 under Number 201.11 (together with any successors and assigns, "Assignor"), and AVIGNON CAPITAL LTD., a company organized under the laws of the British Virgin Islands, with offices located at c/o Citco B.V.I. Limited, Wickhams Cay, P.O. Box 662, Road Town, Tortola, British Virgin Islands (together with any successors and assigns, "Assignee") (each a "Party" and collectively the "Parties").

1. Assignment. Upon the terms and conditions of this Agreement, Assignor, for good and valuable consideration, the sufficiency of which is hereby acknowledged, hereby absolutely and unconditionally sells, transfers and assigns to Assignee, and Assignee hereby purchases, assumes and accepts from Assignor, all of Assignor's right, title, interest, claims and causes of action in and to, or arising under or in connection with (a) the securities specified on Schedule 1 attached hereto (the "Notes"), (b) cash held within (1) Assignor's account number 940-90706, held at Lehman Brothers Inc. ("LBI"), and (2) Assignor's account number 940-90708, held at LBI (together with account number 940-90706, the "Accounts"), and (c) any and all claims (the "Claims") relating to the Accounts filed or to be filed in the insolvency proceedings of LBI, Lehman Brothers Treasury Co. B.V. ("LBT"), and Lehman Brothers Holdings Inc. ("LBHI"),¹ as well as any of its domestic and international subsidiaries and affiliates (collectively, the "Debtors"). For the avoidance of doubt, this assignment includes, without limitation, in connection with (a), (b), and (c) above (i) all of Assignor's right, title and interest in and to any and all proofs of claim filed in respect of the Claims, the Accounts or the Notes, (ii) all of Assignor's right, title and interest in and to all agreements, instruments and other documents evidencing or relating to the Claims, the Accounts or the Notes, (iii) all of Assignor's right to receive principal, interest, fees, expenses, damages, penalties and other amounts in respect of or in connection with any of the foregoing, and (iv) all other claims or causes of action against the Debtors, its affiliates, any guarantor or other third party, together with voting and other rights and benefits arising from, under, or relating to the Claims, the Accounts or the Notes, including, without limitation, all of Assignor's rights to receive cash, securities, instruments and/or other property or distributions issued in connection with any of the foregoing or under the Bankruptcy Code or otherwise (the Claims, the Notes, the Accounts and the items referenced to in (i) through (iv) above are collectively referred to as the "Assigned Interests"). The consideration paid by Assignee to Assignor for the Assigned Interests is [REDACTED] (the "Purchase Price"). Assignor and Assignee agree to keep this transaction and the Purchase Price confidential.

¹ Most of the Lehman Brothers' domestic insolvency proceedings are being jointly administered under *In re Lehman Brothers Holdings Inc., et al.*, Case Number 08-13555 under Chapter 11 of the Bankruptcy Code (11 U.S.C. § 101 et seq.) (the "Bankruptcy Code") in the United States Bankruptcy Court for the Southern District of New York (the "Bankruptcy Court").

Agreement, and also hereby irrevocably waives any defense of improper venue, *forum non conveniens* or lack of personal jurisdiction to any such action brought in such courts. Each Party further irrevocably agrees that any action to enforce, interpret or construe any provisions of this Agreement will be brought only in such courts and each Party waives its right to trial by jury.

8. Waiver of Notice and Hearing Requirement. Assignor hereby waives any notice or hearing requirements imposed under the Bankruptcy Code (including, but not limited to, Rule 3001 of the Federal Rules of Bankruptcy Procedure) or otherwise and stipulates that an order may be entered recognizing this Agreement as an unconditional assignment and Assignee herein as the valid owner of the Assigned Interests.

9. Complete Agreement; Amendment. This Agreement shall constitute the complete agreement of the Parties with respect to the subject matters referred to herein and supersedes all prior or contemporaneous negotiations, promises, covenants, agreements or representations of every nature whatsoever with respect thereto, all of which have become merged and finally integrated into this Agreement. This Agreement cannot be amended, modified, or supplemented except by an instrument in writing executed by the Parties hereto.

10. Counterparts. This Agreement may be executed by telecopy in multiple counterparts and all of such counterparts taken together shall be deemed to constitute one and the same instrument. Transmission by telecopier of this Agreement shall be deemed to constitute due and sufficient delivery of such counterpart. Each fully executed counterpart of this Agreement shall be deemed to be a duplicate original.

[SIGNATURE PAGE TO FOLLOW]



**SCHEDULE 1 TO
ASSIGNMENT AGREEMENT**

Notes

- Corporate bond - Lehman Brothers Treasury Euro Medium Term Note due May 28, 2009;
CUSIP # XS0366401031
- Corporate bond - Lehman Brothers Treasury Euro Medium Term Note due May 28, 2009;
CUSIP # XS0366314226
- International bond - Lehman Brothers Treasury Euro Medium Term Note due
December 20, 2008; CUSIP # XS0336336960

**SCHEDULE 1 TO
EVIDENCE OF TRANSFER**

Notes

- Corporate bond - Lehman Brothers Treasury Euro Medium Term Note due May 28, 2009;
CUSIP # XS0366401031
- Corporate bond - Lehman Brothers Treasury Euro Medium Term Note due May 28, 2009;
CUSIP # XS0366314226
- International bond - Lehman Brothers Treasury Euro Medium Term Note due
December 20, 2008; CUSIP # XS0336336960

**SCHEDULE 1 TO
EVIDENCE OF TRANSFER**

Notes

- Corporate bond - Lehman Brothers Treasury Euro Medium Term Note due May 28, 2009;
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CUSIP # XS0366314226
- International bond - Lehman Brothers Treasury Euro Medium Term Note due
December 20, 2008; CUSIP # XS0336336960

**SCHEDULE 1 TO
EVIDENCE OF TRANSFER**

Notes

- Corporate bond - Lehman Brothers Treasury Euro Medium Term Note due May 28, 2009;
CUSIP # XS0366401031
- Corporate bond - Lehman Brothers Treasury Euro Medium Term Note due May 28, 2009;
CUSIP # XS0366314226
- International bond - Lehman Brothers Treasury Euro Medium Term Note due
December 20, 2008; CUSIP # XS0336336960

EXHIBIT C

In re Lehman Brothers Inc.

Case No. 08-01420 (JMP) SIPA

DECLARATION, RELEASE AND ASSIGNMENT

CLAIMANT: CENTRAL BANCO UNIVERSAL
CLAIM NO.: 900003116
900003115 (Duplicate of claim 900003116)
ACCOUNT NO.: 94090706

The above-named claimant ("Claimant"), having submitted the above-referenced claim(s) (the "Claim") to James W. Giddens (the "Trustee"), as Trustee for the Liquidation of Lehman Brothers Inc. ("LBI"), hereby declares to the Trustee, under penalty of perjury, that Claimant did not receive any payment or other transfer of the Allowed Cash and/or Securities as described in the Notice of Trustee's Determination of Claim dated January 6, 2010 for the above-referenced claim(s) and account number(s) (the "Notice") from LBI, or any entity or other person affiliated with LBI through the date of this declaration.

Claimant, on behalf of Claimant and his, her or their heirs, successors and assigns, contingent only upon receipt of the Allowed Cash and/or Securities as described in and pursuant to the terms of the Notice (the "Consideration") from the Trustee after receipt by the Trustee of this signed Declaration, Release and Assignment, hereby remises, releases, and forever discharges the Trustee and his agents, employees, professionals, successors and assigns, the Securities Investor Protection Corporation ("SIPC") and its agents, employees, officers, directors, professionals, successors and assigns, and the LBI estate (all of the foregoing, collectively, the "Released Persons") of and from any and all claims or causes of action arising out of or relating to the Claim, the circumstances that gave rise to the Claim, any account(s) Claimant had with LBI, and any other transactions or dealings with LBI or any entity or other person affiliated with LBI relating to the Claim, which the Claimant now has, or hereafter can, shall, or may have, for or by any reason of any cause, matter, or thing whatsoever, prior to and including the date of execution hereof. Claimant represents and warrants that it is aware of no liens or claims against the above-referenced account(s) (the "Account") or its contents, and acknowledges and agrees that, to the extent the Account or property contained therein may be subject to any liens or claim, delivery of the Consideration will be subject to any such liens or claims.

Notwithstanding any rights or remedies available to Claimant under applicable law, Claimant acknowledges and agrees to return immediately any property to the LBI estate that is later found by the Trustee or determined by a court (i) to have been distributed in error, (ii) to exceed claimant's proportional share of customer property, or (iii) to be subject to liens or claims of the LBI estate or any other entity or other person and will indemnify and hold harmless the Released Persons from and against any damages, costs or losses that may result from any assertion by any such other entity or other person of any such liens or claims.

Further, Claimant hereby assigns and transfers to the Trustee and SIPC all rights, including any and all claims and causes of action, and any proceeds derived there from, that Claimant may have against any party, arising out of or relating to the Claim, the circumstances that gave rise to the Claim and any account(s) Claimant had with LBI, to the extent of the Consideration.

Notwithstanding anything else herein to the contrary, claims for cash and/or securities, if any, received by the Trustee after September 19, 2008 are not deemed released hereby and the determination of any such claim will be dealt with separately in the Trustee's continuing administration of the estate.

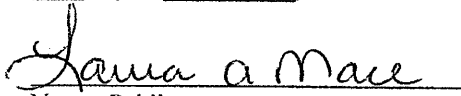
Claimant further acknowledges the sufficiency of the Consideration and that the Trustee may deliver such Consideration in multiple installments. Notwithstanding anything to the contrary herein, to the extent the Consideration is delivered in multiple installments, the releases set forth herein shall take effect only with respect to the portion of the Claim which has been satisfied by such portion of the Consideration.

WITNESS the due execution hereof, intending to be legally bound hereby, this 3rd day of March 2010.


By: Carrie L. Tillman

Title: Manager of
Arignon Capital Ltd.

Sworn to before me this
3rd day of March, 2010.


Notary Public
My commission expires:



Instructions for the transfer of securities for:

CENTRAL BANCO UNIVERSAL
ATTN: ROBERT J GAYDA ESQ
CHADBOURNE & PARKE LLP
30 ROCKEFELLER PLAZA
NEW YORK, NY 10112

Re: Claim Number(s): 900003116
900003115 (Duplicate of claim 900003116)
Account Number(s): 94090706

To: The Trustee for the SIPA Liquidation of Lehman Brothers Inc.

Please deliver the securities to satisfy my claim to:

Name of brokerage firm: _____

Address: _____

City/State/ZIP: _____

For my account (number): _____

Account executive (name): _____

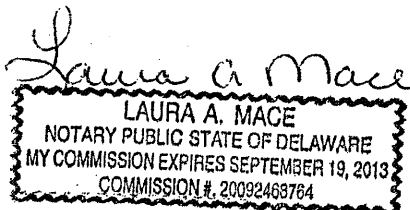
Account executive telephone number: _____

Account executive fax (or e-mail): _____

Signature(s)

Laura Hill 3/3/10
Manager of Arignon Capital Ltd.

Please complete and return this form with the Release.



Execution Copy

EVIDENCE OF TRANSFER

TO: THE DEBTORS AND THE BANKRUPTCY COURT

For value received, the adequacy and sufficiency of which are hereby acknowledged, C.A. CENTRAL BANCO UNIVERSAL ("Assignor") hereby unconditionally and irrevocably sells, transfers and assigns to AVIGNON CAPITAL LTD. ("Assignee") all of its right, title, interest, claims and causes of action in and to, or arising under or in connection with (a) the securities specified on Schedule 1 attached hereto (the "Notes"), (b) cash held within (1) Assignor's account number 940-90706, held at Lehman Brothers Inc. ("LBI"), and (2) Assignor's account number 940-90708, held at LBI (together with account number 940-90706, the "Accounts"), and (c) any and all claims (the "Claims") relating to the Accounts filed or to be filed in the insolvency proceedings of LBI, Lehman Brothers Treasury Co. B.V. and Lehman Brothers Holdings Inc., as well as any of its domestic and international subsidiaries and affiliates (collectively, the "Debtors"). The Notes, the Accounts and the Claims are collectively referred to as the "Assigned Interests."

Assignor hereby waives any objection to the transfer of the Assigned Interests to Assignee on the books and records of the Debtors and the Bankruptcy Court, and hereby waives to the fullest extent permitted by law any notice or right to a hearing as may be imposed by Rule 3001 of the Federal Rules of Bankruptcy Procedure, the Bankruptcy Code, applicable local bankruptcy rules or applicable law. Assignor acknowledges and understands, and hereby stipulates, that an order of the Bankruptcy Court may be entered without further notice to Assignor transferring to Assignee the Assigned Interests and recognizing Assignee as the sole owner and holder of the Assigned Interests. Assignor further directs the Debtors, the Bankruptcy Court and all other interested parties that all further notices relating to the Assigned Interests, and all payments or distributions of money or property in respect of the Assigned Interests, shall be delivered or made to Assignee.

IN WITNESS WHEREOF, this Evidence of Transfer is executed on July 27, 2009.

C.A. CENTRAL BANCO UNIVERSAL

By: 

Name:

Title:



EXHIBIT D

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:	:	Chapter 11 Case No.
	:	
LEHMAN BROTHERS HOLDINGS INC., et al.	:	08-13555 (JMP)
	:	
Debtors.	:	(Jointly Administered)

DECLARATION OF LARA ARYANI

I, LARA ARYANI, declare and state as follows:

1. I am an associate with the law firm of Chadbourne & Parke LLP, attorneys for the below-referenced Claimants in the above-captioned proceedings. Except where indicated otherwise, I make this declaration on my personal knowledge and could competently testify to the matters set forth herein, if necessary.

2. I assisted in the preparation of certain proofs of claim required to be filed pursuant to this court's Order Establishing the Deadline for Filing Proofs of Claim, Approving the Form and Manner of Notice Thereof and Approving the Proof of Claim Form (the "LBHI Bar Date Order") [Docket No. 4271]. In that role, I made a number of inquiries, as set forth below, on behalf of (a) Central Banco Universal ("Central Banco"), (b) Banco Canarias de Venezuela, Banco Universal, C.A. ("Banco Canarias"), (c) Spring Star Corp., as successor to C.N.A. de Seguros La Previsora (together, "Previsora"), (d) Portafolio de Inversiones C2-34, C.A., as successor to Bancoro, C.A. (together, "Bancoro"), (e) Credican, C.A., as successor to Banco Canarias, (f) Bellair Development Group S.A., as successor to Banplus Banco Comercial CA (together, "Banplus"), and (g) Banesco Holdings CA, as successor to Banesco Banco Universal, C.A. (together, "Banesco") (the parties named in (a)-(g) above are referred to herein

as "Claimants") holding Lehman Program Securities (as defined in the Order) in accounts maintained at Lehman Brothers Inc. ("LBI").

3. On October 13, 2009, I called the Depository Trust Company ("DTC") (888-382-2721 and 212-855-8099 and 212-855-1000) and Clearstream Banking, S.A. ("Clearstream") (212-309-1999) to determine how to apply for the blocking numbers requested in the Lehman Programs Securities Proof of Claim form.

4. On October 14, 2009, I emailed counsel for Lehman Brothers Holdings, Inc. ("LBHI") at lehmanteam@weil.com requesting an application for blocking reference numbers in connection with filing a proof of claim with respect to the Lehman Program Securities against LBHI. In response, a Weil Gotshal & Manges LLP ("Weil") attorney named Oliver DeGeest at oliver.degeest@weil.com stated that "All requests for blocking numbers relating to Lehman Programs Securities must be sent to Euroclear Bank, Clearstream Bank and/or other depository prior to 5:00 PM (Prevailing Eastern Time) / 11:00 PM (CET) on October 23, 2009." (A copy of this email correspondence is attached as Ex. A).

5. On October 15, 2009, I called Euroclear Bank ("Euroclear") (+32 2 326 1211 and 646-835-5400), Clearstream (212-309-1999) and DTC (888-382-2721 and 212-855-8099 and 212-855-1000) depositories to inquire whether each depository held the Lehman Program Securities. The representative that I spoke to at each depository stated that the depository could only provide information to entities that have accounts at such depository and that noteholders, unless they had accounts with the depository, could not obtain specific information, including blocking numbers, from the depository.

6. On October 20, 2009, I called Euroclear (+32 2 326 1211 and 646-835-5400)

to inquire about obtaining blocking numbers. I was informed that only the direct account holder, in this case, LBI, could apply for the blocking number.

7. Because it was understood that many LBI accounts had been transferred to Barclays Bank PLC ("Barclays"), on October 20, 2009, I contacted Barclays and asked if Barclays could help identify a LBI contact who would be able to apply for blocking numbers on Claimant's behalf with respect to the Lehman Program Securities. A Barclays representative provided me with the number 1-646-285-9000, which I was told to call. I called this number and left a message with my contact information and a request for a return call.

8. At Chadbourne's direction to obtain blocking numbers, on October 20, 2009, Carla M. Bongioanni, Vice President of Banca International, and Vice President of Finance for Banco Canarias de Venezuela Banco Universal, C.A., contacted Euroclear by email to apply for a blocking number with Euroclear, but Euroclear informed Ms. Bongioanni on October 21, 2009 that only a direct account holder, in this case, LBI, could apply for a blocking number. (A copy of this email correspondence is attached as Ex. B).

9. I am informed that on October 20, 2009, at Chadbourne's direction to obtain blocking numbers, Previsora contacted Euroclear regarding applications for a blocking number, but Euroclear informed Previsora that only a direct account holder, in this case, LBI, could apply for a blocking number.

10. On October 20, 2009, Alejandro Gómez of Central Banco emailed Euroclear to request blocking numbers for Central Banco's notes. On October 21, 2009, Euroclear sent an email rejecting Mr. Gómez's request and informed him that only a direct account holder, in this case, LBI, could apply for the blocking numbers. (A copy of this email correspondence is

attached as Ex. C).

11. On October 21, 2009, I again called the number provided by Barclays (1-646-285-9000) and left a message with my contact information and a request for a return call.

12. On October 21, 2009, I called Barclays and asked if there was an alternative LBI contact who could help me obtain the requisite blocking numbers, or another way to determine whether LBI accounts have been transferred to Barclays, because the LBI number that Barclays had provided (1-646-285-9000) was apparently attached to an answering machine and no one had returned my previous calls. The Barclays representative was unable to provide me with an alternative contact.

13. On October 21, 2009, I called the two LBI media contact numbers listed on the September 16, 2008 press release announcing Barclays' acquisition of LBI: Monique Wise at 1-646-333-9056 and Mark Lane at 1-646-333-8247. Both numbers were out of service. (A copy of this press release is attached here as Ex. D).

14. On October 21, 2009, I again emailed counsel for LBHI at lehmanteam@weil.com and oliver.degeest@weil.com to inquire about how to contact LBI for purposes of obtaining blocking numbers. (A copy of this email correspondence is attached as Ex. E).

15. I am informed that on October 21, 2009, at Chadbourne's direction to obtain blocking numbers, Central Banco called Luis Miguel González, a Barclays Vice-President in Miami, to request contact information for an LBI representative who can request blocking numbers, but Mr. González was not able to provide any information because his New York-

based LBI contact was no longer employed by LBI.

16. On October 21, 2009, at Chadbourne's direction to obtain blocking numbers, Carla M. Bongioanni, Vice President of Banca International, and Vice President of Finance for Banco Canarias de Venezuela Banco Universal, C.A., contacted Mark Quaglia at mark.quaglia@lehman.com at the suggestion of Noel Brennan from Mission Capital, requesting the blocking numbers for each of the Lehman Program Securities held by Banco Canarias. Mr. Quaglia responded by email asking her to clarify what she meant by "blocking number." (A copy of this email correspondence is attached as Ex. F).

17. On October 22, 2009, I emailed Mark Quaglia at LBHI at mark.quaglia@lehman.com to explain what a blocking number is and to request further information on how to obtain it. (A copy of this email correspondence is attached as Ex. G).

18. On October 22, 2009, I called the number listed on the LBI bankruptcy website (1-866-841-7868), and spoke with Mark, a representative of Epiq Bankruptcy Solutions, LLC ("Epiq"). Mark was unable to provide me with any information about Claimants' accounts or how to apply for blocking numbers with respect to the Lehman Program Securities and was also unable to provide me with any information regarding who I or Claimants could contact at LBI in order to obtain the blocking numbers. With respect to all the Lehman Program Securities except Banesco's, Mark also said that most of the LBI brokerage accounts had been transferred out of LBI, but he was unable to provide me with any information about whether Claimants' accounts were transferred, and if so, to where the accounts had been transferred.

19. On October 22, 2009, I received an email from Audrey Susanin at Weil stating, "We saw that you had contacted Epiq Systems on October 21, 2009 and had a question

regarding Lehman Brothers. You may direct your inquiry to lehmanteam@weil.com". (A copy of this email correspondence is attached as Ex. H).

20. I am informed that on October 22, 2009, at Chadbourne's direction to obtain blocking numbers, Carlos Romero of Banplus attempted to apply for blocking numbers with Euroclear, but Euroclear informed Mr. Romero that only a direct account holder, in this case, LBI, could apply for the blocking numbers.

21. On October 23, 2009, Mark Quaglia responded to the requests that Carla M. Bongioanni, Vice President of Banca International, and Vice President of Finance for Banco Canarias de Venezuela Banco Universal, C.A. and I had sent for the blocking numbers to say that "the protocol would be to contact the clearing agency (e.g., Euroclear/Clearstream) to obtain the blocking number. If you do not have an inroad to the clearing agency then the broker from whom you purchased the security or your current broker should be able to procure your blocking number." (A copy of this email correspondence is attached as Ex. I).

22. On October 23, 2009, I spoke with Mark Quaglia at LBHI to request information about how to contact an LBI representative who is able to apply for blocking numbers. Mr. Quaglia suggested that I contact LBI counsel, Hughes Hubbard & Reed LLP.

23. On October 23, 2009, I called the number listed on the LBI bankruptcy website (1-866-841-7868), and spoke with Cecelia, an Epiq representative. I provided Cecelia with Claimants' names and the Lehman Program Securities' ISIN numbers and requested blocking numbers and confirmation that the Lehman Program Securities were still at LBI. Cecelia said she would look into my queries and return my call. Cecelia called me back to say that she was unable to provide me with any information about Claimants' accounts, to apply for

blocking numbers on behalf of Claimants with respect to the Lehman Program Securities or to provide me with any information about who to contact at LBI in order to obtain a blocking number or additional information. She said that in general, all LBI brokerage accounts had been "transferred out of Lehman."

24. I am informed that on October 23, 2009, at Chadbourne's direction to obtain blocking numbers, Lino Andrade of Spring Star called Euroclear in an attempt to apply for a blocking number, but Robert at Euroclear informed Mr. Andrade that only a direct account holder, in this case, LBI, could apply for the a blocking number.

25. I am informed that on October 27, 2009, at Chadbourne's direction to obtain blocking numbers, Hugo Ortega of Banesco contacted JP Morgan, Barclays and a contact of Banesco who is a former employee of LBI in an attempt to locate Banesco's Lehman Program Securities. Mr. Ortega was later told by each that they had made efforts to locate Banesco's Lehman Program Securities, but were unsuccessful.

26. On October 29, 2009, I called Savi Madora at Barclays' wealth management group at 212-526-6488 with respect to Banesco's Lehman Program Securities, and was told that Banesco's 831-03655 LBI account is an old account that used to be a high net worth account in the investment management division. Ms. Madora said that sometime in January or February of 2008, prior to the Lehman bankruptcy, this account was closed, and all the assets in it were transferred to a new institutional LBI account: 940-90657. Ms. Madora said that after the bankruptcy, accounts beginning with the account numbers 940 were set aside for the purpose of being converted into active accounts with Barclays Capital. Ms. Madora said that there were some issues with the conversion; perhaps the accounts were overlooked as not having any assets

or some other oversight, and it's not clear to her whether any, some or all of the 940 accounts were ever converted. Ms. Madora said that at this stage, any 940 account will either be with Barclays Capital or with the estate.

27. Ms. Madora also told me that from around October 2008 until January 2009, she worked directly with Hugo Ortega, who then was also trying to locate his account. She said that at the time, she was directing him to file claims directly against the estate on the assumption that his account might not have converted yet. She said that up until around January 2009, the wealth management group had access to the 940 accounts because though they had been converted into institutional accounts, the access that wealth management originally had to the 940 had not yet been severed. Ms. Madora said that around January 2009, the bank severed wealth management's access to the 940 accounts and informed the wealth management group, including Ms. Madora, that they were no longer to access these accounts or to advise the 940 account holders.

28. Ms. Madora also told me that someone at Barclays Capital should have access to the 940 accounts. She advised that I contact Matthew Clinton, a trader formerly with LBI and now with Barclays Capital, at 212-412-2332. Ms. Madora said that Mr. Clinton was the only person she knew at Barclays Capital who was a legacy LBI employee. Ms. Madora said that Mr. Clinton worked with Banesco regularly in his role as a trader, and while he might not have access to the information we wanted, his boss or the legal counsel or operations manager of his group might be able to help us.

29. On October 29, 2009, I called Matthew Clinton at Barclays at 212-412-2332 seeking to confirm whether Banesco's LBI account had been converted into an institutional

account with Barclays Capital. Mr. Clinton instructed me to email him with my inquiry, which I did. Marybeth Reid of Barclays Capital responded to my email to Matthew Clinton and suggested that I contact an attorney named Jonathan Morris at 212-526-1614. I attempted to reach Mr. Morris at that phone number and was told that Mr. Morris was unavailable but that I should speak with another attorney named Geoffrey Valentino. (A copy of this email correspondence is attached as Ex. J).

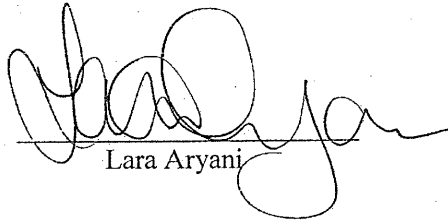
30. On October 29, 2009, I called the number listed on the LBI bankruptcy website (1-866-841-7868), and spoke with Cecelia, an Epiq representative, with whom I had spoken on October 23, 2009. I provided Cecelia with Banesco's name and 831 account number, and reminded her of the ISIN number for one of Banesco's Lehman Program Securities that I had previously asked her to look up on October 23, 2009. I told her that though she could not find any information pertaining to the ISIN number I had previously provided, I had not given her Banesco's name or account number. I said that we were "dotting our Is and crossing our Ts" in our efforts to do everything to obtain the blocking numbers, and asked that she do a search for any information relating to Banesco's name and account number. Cecelia said that she could not find any information about this account or ISIN number, and that she would forward my email along but doubted that she would be able to provide me with any useful information.

31. On October 30, 2009, I again contacted the Barclays Capital group and spoke with an attorney named Geoffrey Valentino to confirm whether Banesco's Lehman Program Securities had been transferred to Barclays Capital. I gave Mr. Valentino both of Banesco's account numbers, the 831 and 940 numbers. Mr. Valentino said he would have someone from his team conduct a search. He later called me back and provided the following information: The assets in the 831-03655 account were transferred to 940-90657 in May 2008, which is when the

last account statement was generated. The 940 account never came to Barclays, it is still with LBI. Mr. Valentino looked into the account and said there was only one Lehman note, unvalued with ISIN XS0336129589. I asked him if there was any way to retrieve old statements relating to the 831 account to find out what happened to any other assets in the account, or if there was a way to do a system-wide search for Banesco. Mr. Valentino contacted me later to say that this was not possible.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

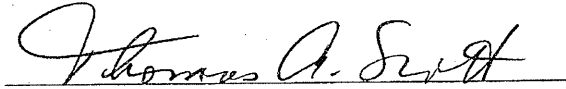
Dated: New York, New York
October 27, 2011



Lara Aryani

STATE OF New York)
 : ss.:
COUNTY OF New York)

On the 27th day of October in the year 2011 before me, the undersigned, personally appeared, LARA ARYANI, personally known to me or proved to me on the basis of satisfactory evidence to be the individual whose name is subscribed to the within instrument and acknowledged to me that he executed the same in his capacity, and that by his signature on the instrument, the individual, or the person upon behalf of which the individual acted, executed the instrument.



Notary Public

THOMAS A. SCOTT
Notary Public, State of New York
No. 015C4792491
Qualified in Queens County
Certificate Filed in New York County
Commission Expires August 31, 2013

Exhibit A

Aryani, Lara

From: DeGeest, Oliver [oliver.degeest@weil.com]
Sent: Wednesday, October 14, 2009 11:47 PM
To: Aryani, Lara; Lehman Team
Subject: RE: Requesting application for blocking reference number

Follow Up Flag: Follow up
Flag Status: Flagged

Lara,

All requests for blocking numbers relating to Lehman Programs Securities must be sent to Euroclear Bank, Clearstream Bank and/or other depository prior to 5:00 PM (Prevailing Eastern Time) / 11:00 PM (CET) on October 23, 2009.

For more information on blocking numbers, please see the Notice of Deadlines for Filing Proofs of Claim Based on Lehman Programs Securities, located at www.lehman-docket.com

Regards,
Oliver

From: Aryani, Lara [mailto:LAryani@chadbourne.com]
Sent: Wednesday, October 14, 2009 12:20 PM
To: Lehman Team
Subject: FW: Requesting application for blocking reference number

Sirs/Madams:

On behalf of our clients, we are writing to request an application for a blocking reference number in connection with filing a proof of claim. Please let me know if we need to provide any additional information in order to receive this application. Thanks very much for your time and assistance.

Best regards,
Lara

Lara Aryani
Chadbourne & Parke LLP
30 Rockefeller Plaza, New York, NY 10112
tel 212-408-5243 | fax 646-710-5243
laryani@chadbourne.com | <http://www.chadbourne.com>
vCard: <http://www.chadbourne.com/vcard/laryani.vcf>

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For additional information about Chadbourne & Parke LLP and Chadbourne & Parke, a multinational partnership, including a list of attorneys, please see our website at <http://www.chadbourne.com>

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Exhibit B

Aryani, Lara

From: Silberman, Patricia
Sent: Wednesday, October 21, 2009 8:07 AM
To: Krivoy, Clara; Aryani, Lara
Subject: Fw: CASE 1461742593 RE: RV: Lehman Brothers - Registration of claims 90590

Follow Up Flag: Follow up
Flag Status: Flagged

Fyi

Please consider the environment before printing this email.

----- Original Message -----

From: corporate_actions@euroclear.com <corporate_actions@euroclear.com>
To: cbongioanni@bancocanarias.com <cbongioanni@bancocanarias.com>
Cc: Silberman, Patricia
Sent: Wed Oct 21 08:03:50 2009
Subject: CASE 1461742593 RE: RV: Lehman Brothers - Registration of claims 90590

Dear Carla,

Please note that the account nr 90590 is not under the name "Banco Canarias de Venezuela Banco Universal, C.A.". However should you need further information regarding your account in Euroclear please dial our Client Service Administration at +32 23 26 1535 or at commercial_client_service_administration@euroclear.com.

Kind regards,

David Chavez

Corporate Actions Client Service
Euroclear Bank S.A./N.V.
Telephone: +32 (0) 2 326 42 45
Reply to corporate_actions@euroclear.com Visit us at: <http://www.euroclear.com>

Want to help us to efficiently handle your queries?
We invite you to have a look at the following link
https://www.euroclear.com/site/publishedFile?DocumentName=MA0886+CS+Qc+2_tcm86-149861.pdf
which tells you who to contact, and what information we need to help you.

-----Original Message-----

From: cbongioanni@bancocanarias.com
Sent: 20/10/2009 06:04:46 PM
To: corporate_actions@euroclear.com
Cc: psilberman@chadbourne.com
Subject: RV: Lehman Brothers - Registration of claims

Good morning,

Please find below the information from our attorney in New York, regarding our account with your Institution. We have been informed by your Customer Service in Belgique that the account number which we are searching for to obtain the blocking number (940-90592) is not a valued number; however, according to our files we have another number, which is 940-90590.

Would you please check ASAP this account number and let me know if this number belongs to Banco Canarias de Venezuela Banco Universal, C.A.? The request of this information is due to the dead line of October 23, 2009, to obtain the blocking number.

Thanks in advance for your prompt response.

Best regards,

Carla M. Bongioanni R.

Vicepresidente Banca Internacional

VP Finanzas

Banco Canarias de Venezuela Banco Universal, C.A.

email: cbongioanni@bancocanarias.com

Tel: +58212 210 1135

Fax: +58212 210 1105

De: Cesamar Briceño

Enviado el: Lunes, 19 de Octubre de 2009 09:00 a.m.

Para: Carla Bongioanni (VP. de Banca Internacional)

CC: Rita M. Mulkay

Asunto: RV: Lehman Brothers - Registration of claims

Buenos días Sra. Carla,

Ajunto correo enviado por el Sr. Angel Meza.

Saludos,

Cesamar Briceño

Asistente VP Ejecutivo

Banco Canarias

cbriceno@bancocanarias.com

www.bancocanarias.com.ve

Telf: +58 (212) 210.10.19

Fax: +58 (212) 956.95.30

-----Mensaje original-----

De: Angel Meza [mailto:edelbas@gmail.com] Enviado el: Lunes, 19 de Octubre de 2009 08:42 a.m.
Para: joanna.pino@yahoo.com; Cesamar Briceño
Asunto: Fwd: Lehman Brothers - Registration of claims

Cesamar:

Por favor hazle llegar este email a Carla Bongiani para que nos ayude con el swift que necesitamos transmitir a Euroclear segun el email anexo y entregale a Alvaro una copia cuando llegue.

Gracias

Angel Meza

----- Forwarded message -----

From: Silberman, Patricia <PSilberman@chadbournne.com>
Date: 2009/10/16
Subject: RE: Lehman Brothers - Registration of claims
To: "ameza@bancocanarias.com" <ameza@bancocanarias.com>, "edelbas@gmail.com " <edelbas@gmail.com>
Cc: "Krivoy, Clara" <CKrivoy@chadbournne.com>, "Aryani, Lara" <LAryani@chadbournne.com>

Estimado Angel,

Te adjunto e-mail preparado por nuestro grupo de bankruptcy relativo al procedimiento que hay que seguir para obtener el blocking number de manera de poder registrar el claim respecto a las notas de Banco Canarias. Como se explica en el mail, nosotros no podemos obtener dicho numero por ustedes por lo que ustedes deben contactar directamente a Euroclear. Les pido nos envíen a la brevedad dicho blocking number asi como el amount de los claims al 15 de septiembre de 2008 para poder registrar el claim a tiempo.
Saludos, Patricia

In order to file the proof of claims relating to your Lehman notes, you must obtain a blocking reference number for each of these notes. We are unfortunately not authorized to apply for these numbers on your behalf. The application process will require you to send particular banking instructions to Euroclear, the depository that is holding your notes.

The deadline for requesting these blocking numbers is 5:00 p.m. Eastern Standard Time, October 23, 2009--a week from today. You cannot file a claim without a blocking number, so it is absolutely critical that you request the number before the deadline.

To apply to Euroclear, please send them a Euclid instruction type 37 or a Swift instruction type 553 requesting the blocking numbers for each of your notes. Any additional information you require to send these instructions should be on the notification you received from Euroclear, and you can also contact Euroclear directly at +1 646 835 5400.

Below is a chart with some of the information we have regarding your eligible notes. For your reference only, we have included the value of the notes earlier this year, but this is outdated information. Please calculate and add the value of the claim as of September 15, and confirm all other information in the chart before sending your instructions, including that the list is complete and contains all the notes that you own.

Entity	Depository	Account No.	CUSIP/ISIN	Claim Value as in our outdated records	Claim Value as of September 15, 2008	Name of Note
Banco Canarias	Euroclear	940-90592	XS0295087042	VEF 537,500,000 or	Please Add	Treasury Co. Euro Medium

				VEB 537,500, 000,000		Term Note
Banco Canarias	Eurocle ar	940-90 592	XS02587 31909	VEF 306,375, 000 or VEB 537,500, 000,000	Please Add	Treasury Co. B.V. 0.00% 20120620

From: Silberman, Patricia
Sent: Wednesday, October 07, 2009 1:51 PM
To: 'Leonardo Romy'
Cc: dpalmar@bancocanarias.com; Krivoy, Clara; Barredo, Nilo
Subject: RE: Lehman Brothers - Registration of claims

Leonardo,

Estamos ahora en el proceso de registrar los claims relativos a los Lehman Brothers Treasury Notes. Para esos efectos, necesitamos completar el cuadro que a continuacion te adjunto. Si bien, tenemos parte de la informacion que se requiere en este cuadro, mucho agradeceriamos si nos puedes otorgar la informacion relativa al blocking number de las notas de Banco Canarias. Si no tuvieras como obtener dicha informacion, nosotros contactariamos al depositario correspondiente para solicitarla. Quedo a tu disposicion frente a cualquier pregunta o comentario. Gracias, Patricia

Issuer	Description of Security	ISIN	Blocking Number	Account Number	Amount of Claim

Patricia Silberman | Associate
Chadbourn & Parke LLP
30 Rockefeller Plaza, New York, NY 10112 tel 212-408-5563 | fax 646-710-5563
psilberman@chadbourn.com | <http://www.chadbourn.com>
vCard: <http://www.chadbourn.com/vcard/psilberman.vcf>

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For additional information about Chadbourn & Parke LLP and Chadbourn & Parke, a multinational partnership, including a list of attorneys, please see our website at <http://www.chadbourn.com>.

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Exhibit C

Aryani, Lara

From: Silberman, Patricia
Sent: Thursday, October 27, 2011 4:34 PM
To: Aryani, Lara
Subject: FW: CASE 1461752162 RE: Require a Bolcking Number. VERY IMPORTANT 90706

Importance: High

----- Original Message -----

From: corporate.actions@euroclear.com <corporate.actions@euroclear.com>
To: agomezsigala@gmail.com <agomezsigala@gmail.com>
Cc: jbeleno@strategosvalores.com <jbeleno@strategosvalores.com>; Krivoy, Clara; Silberman, Patricia
Sent: Wed Oct 21 07:23:18 2009
Subject: CASE 1461752162 RE: Require a Bolcking Number. VERY IMPORTANT 90706

Dear Alejandro

In order for us to go forward with you request, please send us your email again mentioning a valid Euroclear account number (5 digits).

Do also note that, for security reasons, it's also a Euroclear procedure that your mail address has to match with the account number.

Please re-send your email to corporate.actions@euroclear.com indicating the Euroclear investigation number in the subject of your e-mail.

The case will then be re-opened and dealt with in the shortest delay.

With kind regards,

Corporate Actions Client Service
Euroclear Bank S.A. /N.V.
Telephone: +32 (0) 2 326 42 45
Reply to corporate.actions@euroclear.com Visit us at: <http://www.euroclear.com>

-----Original Message-----

From: agomezsigala@gmail.com
Sent: 21/10/2009 12:12:18 AM
To: corporate.actions@euroclear.com
Cc: jbeleno@strategosvalores.com; "Krivoy, Clara" <CKrivoy@chadbourne.com>; "Silberman, Patricia" <PSilberman@chadbourne.com>
Subject: Require a Bolcking Number. VERY IMPORTANT

Please i am writing on behalf Central banco Universal to request a Blocking number For the following Structure Notes issued by Lehman brothers.

Depository	Account No.	CUSIP/ISIN Euroclear
------------	-------------	----------------------

940-90706	XS0366401031 Euroclear	940-
-----------	------------------------	------

90706	XS0366314226 Euroclear	940-
-------	------------------------	------

90706	XS0336336960	Thank you for the attention to this matter. Is really important to have this number before friday.
-------	--------------	--

Best Regards.

Alejandro Gómez

This e-mail message, including any attachments transmitted with it, is CONFIDENTIAL and may contain legally privileged information. This message is intended solely for the use of the individual or entity to whom it is addressed. If you have received this message in error, please notify us immediately and delete it from your system. Please visit our website to read the full disclaimer: <http://www.euroclear.com/site/public/disclaimer>

Exhibit D

LEHMAN BROTHERS

Press Release

For Immediate Release

Lehman Brothers

Media Contact: Monique Wise
1-646-333-9056
Mark Lane
1-646-333-8247

Barclays Capital

Media Contact: Leigh Bruce
44 (0)20-7773-7371
Peter Truell
1-212-412-7576
Simon Eaton
44 (0) 7917-068-479

Investor Contact: Mark Merson

44 (0) 20-7116-5752
John McIvor
44 (0) 20-7116-2929

BARCLAYS TO ACQUIRE LEHMAN BROTHERS' BUSINESSES AND ASSETS

- Barclays Agrees to Acquire Lehman Brothers' North American Investment Banking, and Fixed Income and Equities Sales, Trading and Research Operations, Including Approximately 10,000 Employees
- Discussions to Acquire Lehman Brothers' Select Operations Outside of North America
- Barclays Agrees to Purchase Lehman Brothers' Headquarters Office Building and Two Other Facilities
- Barclays Enters into Support Agreement with Lehman Brothers to provide:
 - \$500 Million DIP-Financing to Lehman Brothers Holdings Inc.
 - A Substantial Interim Credit Facility to Lehman Brothers Inc.

London and New York, September 16, 2008 – Barclays Capital, the investment banking division of Barclays Bank PLC (LSE: BARC), has signed a definitive agreement to acquire

substantially all of the North American businesses and operating assets of Lehman Brothers Inc., a wholly-owned subsidiary of Lehman Brothers Holdings Inc. (NYSE: LEH), and certain related assets of Lehman Brothers Holdings Inc. and its affiliates for consideration consisting of assumed liabilities, \$250 million in cash and certain contingent considerations. Barclays also entered into a definitive agreement to acquire the headquarters of Lehman Brothers, located at 745 Seventh Avenue in New York City, as well as its two data centers located in New Jersey for an aggregate of approximately \$1.45 billion. The final acquisition price of the headquarters and other real estate assets is subject to appraised value.

The businesses to be acquired will include Lehman Brothers' Investment Banking, and Fixed Income and Equities Sales, Trading and Research operations, as well as certain supporting functions. These operations will be acquired by Barclays Capital, accelerating the growth of a formidable player in the global marketplace. Approximately 10,000 employees of Lehman Brothers Inc. and Lehman Brothers Holdings Inc. in North America and certain of its subsidiaries will join Barclays upon the closing of the transactions.

In addition to the agreed transaction, Barclays Capital intends to immediately commence discussions with the relevant international regulatory authorities to acquire Lehman Brothers' similar operations outside North America, although there can be no assurances such international operations will be acquired.

Barclays Capital also has agreed to provide debtor-in-possession (DIP) financing to Lehman Brothers Holdings Inc. of \$500 million and a substantial interim credit facility to Lehman Brothers Inc. to fund Lehman Brothers Inc.'s ongoing operations. Barclays has also entered into an agreement to provide information technology, operational and other support services. These steps ensure Lehman Brothers' continued operations and ability to meet client expectations.

Lehman Brothers Holdings Inc.'s U.S. registered broker-dealers will continue their normal operations.

Separately, Lehman Brothers Holdings Inc. is engaged in advanced discussions to sell its Investment Management Division to a third party in an unrelated transaction.

Commenting on this announcement, John Varley, Barclays Group Chief Executive, said, "The proposed acquisition of Lehman Brothers North American investment banking and capital market operations accelerates the execution of our strategy of diversification by geography and business in pursuit of profitable growth on behalf of our shareholders, in particular increasing the percentage of Barclays earnings sourced in North America. This transaction delivers the strategic benefits of a combination with Lehman Brothers core franchise, whilst meeting Barclays strict financial criteria, and strengthening our capital ratios."

Robert E. Diamond, Jr., Barclays President, said, "This is a once in a lifetime opportunity for Barclays. We will now have the best team and most productive culture across the world's major financial markets, backed by the resources of an integrated universal bank. We welcome the opportunity to add Lehman's people and capabilities to the Barclays team."

"This is a wonderful outcome for a great number of our employees that will preserve and strengthen our terrific franchise," said Richard S. Fuld, Jr., Chairman and Chief Executive Officer of Lehman Brothers.

Bart McDade, Lehman Brothers President and Chief Operating Officer, said, "Lehman Brothers strength has always been our client franchise. With this transaction, we have the opportunity to continue the growth and development of our U.S. investment banking and capital market franchises with one of the leading financial institutions in the world. Together with Barclays, these businesses will be a part of a global financial services powerhouse delivering a comprehensive suite of products and services to our clients."

The transactions have been approved by the Boards of Directors of Barclays Bank PLC, Lehman Brothers Holdings Inc. and Lehman Brothers Inc. No shareholder approvals are required for the transactions.

The transaction is subject to Bankruptcy Court approval. Lehman Brothers will file an emergency motion with the Bankruptcy Court for the Southern District of New York to seek a hearing to approve a break-up fee and related bid procedures and will seek a hearing in the Bankruptcy Court for later this week to obtain approval of the transaction.

About Barclays Bank PLC

Barclays is a major global financial services provider engaged in retail and commercial banking, credit cards, investment banking, wealth management and investment management services, with an extensive international presence in Europe, the USA, Africa and Asia.

With over 300 years of history and expertise in banking, Barclays operates in over 50 countries and employs 147,000 people. Barclays moves, lends, invests and protects money for over 42 million customers and clients worldwide.

About Barclays Capital

Barclays Capital is the investment banking division of Barclays Bank PLC which has an AA long-term credit rating and a balance sheet of £1.4 trillion. With a distinctive business model, Barclays Capital provides large corporate, government and institutional clients with solutions to their financing and risk management needs. Barclays Capital has offices around the world, employs over 16,300 people and has the global reach and distribution power to meet the needs of issuers and investors worldwide.

About Lehman Brothers

Lehman Brothers (ticker symbol: LEH), an innovator in global finance, serves the financial needs of corporations, governments and municipalities, institutional clients and high net worth individuals worldwide. Founded in 1850, Lehman Brothers maintains leadership positions in equity and fixed income sales, trading and research, investment banking, private investment management, asset management and private equity. The Firm is headquartered in New York, with regional headquarters in London and Tokyo, and operates in a network of offices around the world. For further information about Lehman Brothers' services, products and recruitment opportunities, visit the Firm's Web site at www.lehman.com.

Analyst and Investor Conference Call

A conference call for analysts and institutional investors will be hosted by John Varley, Barclays Group Chief Executive and Robert E. Diamond, Jr., Barclays President. The call will commence at 12.00pm (BST) 17 September 2008.

To access the live conference call please dial 0845 401 9092 (UK callers) or +44 20 3023 4419 (all other locations). Access code: "Barclays Announcement". A live webcast of the conference call will also be available at www.barclays.com/investorrelations.

A replay of the conference call and webcast will be available after the event. Access will be available via the Barclays investor relations website at the above address.

Forward-looking statements

This announcement contains certain forward-looking statements with respect to certain of Barclays plans and its current goals and expectations relating to its future financial condition and performance and which involve a number of risks and uncertainties. Barclays cautions readers that no forward-looking statement is a guarantee of future performance and that actual results could differ materially from those contained in the forward-looking statements. These forward-looking statements can be identified by the fact that they do not relate only to historical or current facts. Forward-looking statements sometimes use words such as 'aim', 'anticipate', 'target', 'expect', 'estimate', 'intend', 'plan', 'goal', 'believe', or other words of similar meaning. Examples of forwardlooking statements include, among others, statements regarding consummation of the proposed acquisition of the Lehman Brothers businesses by Barclays within the expected timeframe and on the expected terms (if at all), the benefits of the proposed acquisition of certain of the Lehman Brothers businesses by Barclays, including the achievement of synergy targets, Barclays future financial position, income growth, impairment charges, business strategy, projected costs, estimates of capital expenditure and revenue benefits, projected levels of growth in the banking and financial markets, the enlarged group's future financial and operating results, future financial position, projected costs, estimates of capital expenditure, and plans and objectives for future operations of Barclays and the enlarged group and other statements that are not historical fact.

By their nature, forward-looking statements involve risk and uncertainty because they relate to future events and circumstances, including, but not limited to, UK domestic and global economic and business conditions, the effects of continued volatility in credit markets, market-related risks such as changes in interest rates and exchange rates, the policies and actions of governmental and regulatory authorities, changes in legislation, the further development of standards and interpretations under International Financial Reporting Standards ("IFRS") applicable to past, current and future periods, evolving practices with regard to the interpretation and application of standards under IFRS, the outcome of pending and future litigation, the success of future

acquisitions and other strategic transactions and the impact of competition — a number of which factors are beyond Barclays control. As a result, Barclays actual future results may differ materially from the plans, goals, and expectations set forth in Barclays forward-looking statements. Any forward-looking statements made herein by or on behalf of Barclays speak only as of the date they are made. Except as required by the FSA, the London Stock Exchange or applicable law, Barclays expressly disclaims any obligation or undertaking to release publicly any updates or revisions to any forward-looking statements contained in this announcement to reflect any changes in Barclays expectations with regard thereto or any changes in events, conditions or circumstances on which any such statement is based. The reader should, however, consult any additional disclosures that Barclays has made or may make in documents it has filed or may file with the SEC.

###

Exhibit E

Aryani, Lara

From: Aryani, Lara
Sent: Wednesday, October 21, 2009 10:28 AM
To: 'DeGeest, Oliver'; Lehman Team
Subject: RE: Requesting application for blocking reference number

Follow Up Flag: Follow up
Flag Status: Flagged

Oliver,

As a follow-up to our correspondence below, our clients' notes are deposited with Euroclear through Lehman Brothers brokerage accounts and were told that only Lehman Brothers, the Euroclear account holders, may request the blocking numbers. How may the client get in touch with Lehman Brothers? Thank you.

Lara

Lara Aryani
Chadbourne & Parke LLP
30 Rockefeller Plaza, New York, NY 10112
tel 212-408-5243 | fax 646-710-5243
laryani@chadbourne.com | <http://www.chadbourne.com>
vCard: <http://www.chadbourne.com/vcard/laryani.vcf>

Please consider the environment before printing this email.

From: DeGeest, Oliver [<mailto:oliver.degeest@weil.com>]
Sent: Wednesday, October 14, 2009 11:47 PM
To: Aryani, Lara; Lehman Team
Subject: RE: Requesting application for blocking reference number

Lara,

All requests for blocking numbers relating to Lehman Programs Securities must be sent to Euroclear Bank, Clearstream Bank and/or other depository prior to 5:00 PM (Prevailing Eastern Time) / 11:00 PM (CET) on October 23, 2009.

For more information on blocking numbers, please see the Notice of Deadlines for Filing Proofs of Claim Based on Lehman Programs Securities, located at www.lehman-docket.com

Regards,
Oliver

From: Aryani, Lara [<mailto:L.Aryani@chadbourne.com>]
Sent: Wednesday, October 14, 2009 12:20 PM
To: Lehman Team
Subject: FW: Requesting application for blocking reference number

Sirs/Madams:

On behalf of our clients, we are writing to request an application for a blocking reference number in connection with filing a proof of claim. Please let me know if we need to provide any additional information in order to receive this application. Thanks very much for your time and assistance.

Best regards,
Lara

Lara Aryani
Chadbourn & Parke LLP
30 Rockefeller Plaza, New York, NY 10112
tel 212-408-5243 | fax 646-710-5243
laryani@chadbourn.com | <http://www.chadbourn.com>
vCard: <http://www.chadbourn.com/vcard/laryani.vcf>

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Exhibit F

Aryani, Lara

From: Silberman, Patricia
Sent: Wednesday, October 19, 2011 11:06 AM
To: Rivera, Christy; Aryani, Lara
Subject: FW: Lehman Brothers - Registration of claims
Attachments: doc_20091020_130420.PDF

Importance: High

I think you already have this but just in case

Patricia Silberman | Associate
Chadbourne & Parke LLP
30 Rockefeller Plaza, New York, NY 10112
tel 212-408-5563 | fax 646-710-5563
psilberman@chadbourne.com | <http://www.chadbourne.com>
vCard: <http://www.chadbourne.com/vcard/psilberman.vcf>

Please consider the environment before printing this email.

From: Carla Bongioanni (VP. de Banca Internacional) [<mailto:cbongioanni@bancocanarias.com>]
Sent: Wednesday, October 21, 2009 2:58 PM
To: mark.quaglia@lehman.com
Cc: Silberman, Patricia
Subject: RV: Lehman Brothers - Registration of claims
Importance: High

Dear Mark:

I have been referred to you by Noel Brennan, from Mission Capital, as we need ASAP the blocking number for each one of the Lehman notes in the name of Banco Canarias de Venezuela Banco Universal, C.A.

I would appreciate very much your prompt response to this matter.

Best regards,

Carla M. Bongioanni R.
Vicepresidente Banca Internacional
VP Finanzas
Banco Canarias de Venezuela Banco Universal, C.A.
email: cbongioanni@bancocanarias.com
Tel: +58212 210 1135
Fax: +58212 210 1105

De: Silberman, Patricia [<mailto:PSilberman@chadbourne.com>]
Enviado el: Martes, 20 de Octubre de 2009 12:50 p.m.
Para: Carla Bongioanni (VP. de Banca Internacional)
CC: Krivoy, Clara; Aryani, Lara
Asunto: RE: Lehman Brothers - Registration of claims

La informacion la sacamos de los antecedentes proporcionados por Canarias. Les adjunto documento al respecto.

Gracias,
Patricia

Patricia Silberman | Associate
Chadbourne & Parke LLP
30 Rockefeller Plaza, New York, NY 10112
tel 212-408-5563 | fax 646-710-5563
psilberman@chadbourne.com | <http://www.chadbourne.com>
vCard: <http://www.chadbourne.com/vcard/psilberman.vcf>

Please consider the environment before printing this email.

From: Carla Bongioanni (VP. de Banca Internacional) [<mailto:cbongioanni@bancocanarias.com>]
Sent: Tuesday, October 20, 2009 12:58 PM
To: Silberman, Patricia
Subject: RE: Lehman Brothers - Registration of claims
Importance: High

Patricia, dice Carla que Euroclear le informa que esos números no existen, que de donde usted los obtuvo.

Saludos,

Rita

Carla M. Bongioanni R.
Vicepresidente Banca Internacional
VP Finanzas
Banco Canarias de Venezuela Banco Universal, C.A.
email: cbongioanni@bancocanarias.com
Tel: +58212 210 1135
Fax: +58212 210 1105

De: Silberman, Patricia [<mailto:PSilberman@chadbourne.com>]
Enviado el: Martes, 20 de Octubre de 2009 11:46 a.m.
Para: Carla Bongioanni (VP. de Banca Internacional)
CC: Krivoy, Clara
Asunto: RE: Lehman Brothers - Registration of claims

Gracias Carla. En atencion al deadline y dado que tienen este nuevo numero, les recomiendo llamar por telefono al siguiente numero a ver si los pueden ayudar mas rapido:

+1 646 835 5400.

Saludos,
Patricia

Patricia Silberman | Associate
Chadbourne & Parke LLP
30 Rockefeller Plaza, New York, NY 10112
tel 212-408-5563 | fax 646-710-5563
psilberman@chadbourne.com | <http://www.chadbourne.com>
vCard: <http://www.chadbourne.com/vcard/psilberman.vcf>

Please consider the environment before printing this email.

From: Carla Bongioanni (VP. de Banca Internacional) [mailto:cbongioanni@bancocanarias.com]
Sent: Tuesday, October 20, 2009 12:05 PM
To: corporate_actions@euroclear.com
Cc: Silberman, Patricia
Subject: RV: Lehman Brothers - Registration of claims
Importance: High

Good morning,

Please find below the information from our attorney in New York, regarding our account with your Institution. We have been informed by your Customer Service in Belgique that the account number which we are searching for to obtain the blocking number (940-90592) is not a valued number; however, according to our files we have another number, which is 940-90590. Would you please check ASAP this account number and let me know if this number belongs to Banco Canarias de Venezuela Banco Universal, C.A.? The request of this information is due to the dead line of October 23, 2009, to obtain the blocking number.

Thanks in advance for your prompt response.

Best regards,

Carla M. Bongioanni R.
Vicepresidente Banca Internacional
VP Finanzas
Banco Canarias de Venezuela Banco Universal, C.A.
email: cbongioanni@bancocanarias.com
Tel: +58212 210 1135
Fax: +58212 210 1105

De: Cesamar Briceño
Enviado el: Lunes, 19 de Octubre de 2009 09:00 a.m.
Para: Carla Bongioanni (VP. de Banca Internacional)
CC: Rita M. Mulkay
Asunto: RV: Lehman Brothers - Registration of claims

Buenos días Sra. Carla,

Ajunto correo enviado por el Sr. Angel Meza.

Saludos,

Cesamar Briceño
Asistente VP Ejecutivo
Banco Canarias
cbriceno@bancocanarias.com
www.bancocanarias.com.ve
Telf: +58 (212) 210.10.19
Fax: +58 (212) 956.95.30

-----Mensaje original-----

De: Angel Meza [mailto:edelbas@gmail.com]
Enviado el: Lunes, 19 de Octubre de 2009 08:42 a.m.
Para: joanna.pino@yahoo.com; Cesamar Briceño
Asunto: Fwd: Lehman Brothers - Registration of claims

Cesamar:

Por favor hazle llegar este email a Carla Bongiani para que nos ayude con el swift que necesitamos transmitir a Euroclear segun el email anexo y entregale a Alvaro una copia cuando llegue.

Gracias

Angel Meza

----- Forwarded message -----

From: **Silberman, Patricia** <PSilberman@chadbourn.com>

Date: 2009/10/16

Subject: RE: Lehman Brothers - Registration of claims

To: "ameza@bancocanarias.com" <ameza@bancocanarias.com>, "edelbas@gmail.com" <edelbas@gmail.com>

Cc: "Krivoy, Clara" <CKrivoy@chadbourn.com>, "Aryani, Lara" <LAryani@chadbourn.com>

Estimado Angel,

Te adjunto e-mail preparado por nuestro grupo de bankruptcy relativo al procedimiento que hay que seguir para obtener el blocking number de manera de poder registrar el claim respecto a las notas de Banco Canarias. Como se explica en el mail, nosotros no podemos obtener dicho numero por ustedes por lo que ustedes deben contactar directamente a Euroclear. Les pido nos envíen a la brevedad dicho blocking number asi como el amount de los claims al 15 de septiembre de 2008 para poder registrar el claim a tiempo. Saludos, Patricia

In order to file the proof of claims relating to your Lehman notes, you must obtain a blocking reference number for each of these notes. We are unfortunately not authorized to apply for these numbers on your behalf. The application process will require you to send particular banking instructions to Euroclear, the depository that is holding your notes.

The deadline for requesting these blocking numbers is 5:00 p.m. Eastern Standard Time, October 23, 2009--a week from today. You cannot file a claim without a blocking number, so it is absolutely critical that you request the number before the deadline.

To apply to Euroclear, please send them a Euclid instruction type 37 or a Swift instruction type 553 requesting the blocking numbers for each of your notes. Any additional information you require to send these instructions should be on the notification you received from Euroclear, and you can also contact Euroclear directly at +1 646 835 5400.

Below is a chart with some of the information we have regarding your eligible notes. For your reference only, we have included the value of the notes earlier this year, but this is outdated information. Please calculate and add the value of the claim as of September 15, and confirm all other information in the chart before sending your instructions, including that the list is complete and contains all the notes that you own.

Entity	Depository	Account No.	CUSIP/ISIN	Claim Value as in our outdated records	Claim Value as of September 15, 2008
Banco Canarias	Euroclear	940-90592	XS0295087042	VEF 537,500,000 or VEB 537,500,000,000	<i>Please Add</i>
Banco Canarias	Euroclear	940-90592	XS0258731909	VEF 306,375,000 or VEB 537,500,000,000	<i>Please Add</i>

From: Silberman, Patricia
Sent: Wednesday, October 07, 2009 1:51 PM
To: 'Leonardo Romay'
Cc: dpalmar@bancocanarias.com; Krivoy, Clara; Barredo, Nilo
Subject: RE: Lehman Brothers - Registration of claims

Leonardo,

Estamos ahora en el proceso de registrar los claims relativos a los Lehman Brothers Treasury Notes. Para esos efectos, necesitamos completar el cuadro que a continuacion te adjunto. Si bien, tenemos parte de la informacion que se requiere en este cuadro, mucho agradeceriamos si nos puedes otorgar la informacion relativa al blocking number de las notas de Banco Canarias. Si no tuvieras como obtener dicha informacion, nosotros contactariamos al depositario correspondiente para solicitarla. Quedo a tu disposicion frente a cualquier pregunta o comentario. Gracias, Patricia

Issuer	Description of Security	ISIN	Blocking Number	Account Number	A

Patricia Silberman | Associate
Chadbourne & Parke LLP
30 Rockefeller Plaza, New York, NY 10112
tel 212-408-5563 | fax 646-710-5563
psilberman@chadbourne.com | <http://www.chadbourne.com>
vCard: <http://www.chadbourne.com/vcard/psilberman.vcf>

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Exhibit G

Aryani, Lara

From: Aryani, Lara
Sent: Thursday, October 22, 2009 10:43 PM
To: 'mark.quaglia@lehman.com'
Cc: Silberman, Patricia
Subject: RE: RV: Lehman Brothers - Registration of claims

Follow Up Flag: Follow up
Flag Status: Flagged

Mark,

I work with Patricia Silberman at Chadbourne and I am writing regarding the account of our client, Banco Canarias. Unfortunately, I wasn't party to earlier correspondence, so I apologize in advance for repeating anything that might have already been said. As Carla indicated below, Banco Canarias is urgently trying to apply for a blocking number for the note being held in a Lehman Brothers, Inc. account. The details of the note are below. As you probably already know, the blocking number is like a confirmation number that the note will not be traded--that it is locked, so to speak ("blocked" from trading). Only the custodian of the note can issue this number, and so in this case, LBI is the only entity in a position to do this.

My understanding is that October 23 is the deadline to apply for this number.

I would be more than happy to discuss this further over the phone or by email if you require any additional information or would be available to provide us with any information about this request. Please do not hesitate to contact me. Thank you in advance for your assistance.

Best,
Lara

Client Account No.	CUSIP/ISIN	Face Value	Name of Note	Note Expiration
940-90592	XS0295087042	VEF 537,500,000 or VEB 537,500,000,000	Treasury Co. Euro Medium Term Note	April 26, 2017, subject to the Early Redemption Event provision.

Lara Aryani
Chadbourne & Parke LLP
30 Rockefeller Plaza, New York, NY 10112
tel 212-408-5243 | fax 646-710-5243
laryani@chadbourne.com | <http://www.chadbourne.com>
vCard: <http://www.chadbourne.com/vcard/laryani.vcf>

Please consider the environment before printing this email.

From: Carla Bongioanni (VP. de Banca Internacional) <cbongioanni@bancocanarias.com>
To: Quaglia, Mark <mark.quaglia@lehman.com>
Cc: Silberman, Patricia
Sent: Wed Oct 21 16:02:06 2009
Subject: RE: RV: Lehman Brothers - Registration of claims
Hi Mark

We're talking about the Notes that we have in LB.

Patricia, could you please explain to Mark

Thanks

Carla M. Bongioanni R.
Vicepresidente Banca Internacional
VP Finanzas
Banco Canarias de Venezuela Banco Universal, C.A.
email: cbongioanni@bancocanarias.com
Tel: +58212 210 1135
Fax: +58212 210 1105

De: Quaglia, Mark [mailto:mark.quaglia@lehman.com]
Enviado el: Miércoles, 21 de Octubre de 2009 02:41 p.m.
Para: Carla Bongioanni (VP. de Banca Internacional)
CC: PSilberman@chadbourn.com
Asunto: Re: RV: Lehman Brothers - Registration of claims

Hi Carla,

Can you clarify what you mean by "blocking number".

Best,
Mark

From: Carla Bongioanni (VP. de Banca Internacional)
To: Quaglia, Mark
Cc: Silberman, Patricia
Sent: Wed Oct 21 14:58:18 2009
Subject: RV: Lehman Brothers - Registration of claims
Dear Mark:

I have been referred to you by Noel Brennan, from Mission Capital, as we need ASAP the blocking number for each one of the Lehman notes in the name of Banco Canarias de Venezuela Banco Universal, C.A.

I would appreciate very much your prompt response to this matter.

Best regards,

Carla M. Bongioanni R.
Vicepresidente Banca Internacional
VP Finanzas
Banco Canarias de Venezuela Banco Universal, C.A.
email: cbongioanni@bancocanarias.com
Tel: +58212 210 1135
Fax: +58212 210 1105

De: Silberman, Patricia [mailto:PSilberman@chadbourn.com]
Enviado el: Martes, 20 de Octubre de 2009 12:50 p.m.
Para: Carla Bongioanni (VP. de Banca Internacional)

CC: Krivoy, Clara; Aryani, Lara
Asunto: RE: Lehman Brothers - Registration of claims

La informacion la sacamos de los antecedentes proporcionados por Canarias. Les adjunto documento al respecto.

Gracias,
Patricia

Patricia Silberman | Associate
Chadbourne & Parke LLP
30 Rockefeller Plaza, New York, NY 10112
tel 212-408-5563 | **fax** 646-710-5563
psilberman@chadbourne.com | <http://www.chadbourne.com>
vCard: <http://www.chadbourne.com/vcard/psilberman.vcf>

Please consider the environment before printing this email.

From: Carla Bongioanni (VP. de Banca Internacional) [<mailto:cbongioanni@bancocanarias.com>]
Sent: Tuesday, October 20, 2009 12:58 PM
To: Silberman, Patricia
Subject: RE: Lehman Brothers - Registration of claims
Importance: High

Patricia, dice Carla que Euroclear le informa que esos números no existen, que de donde usted los obtuvo.

Saludos,

Rita

Carla M. Bongioanni R.
Vicepresidente Banca Internacional
VP Finanzas
Banco Canarias de Venezuela Banco Universal, C.A.
email: cbongioanni@bancocanarias.com
Tel: +58212 210 1135
Fax: +58212 210 1105

De: Silberman, Patricia [<mailto:PSilberman@chadbourne.com>]
Enviado el: Martes, 20 de Octubre de 2009 11:46 a.m.
Para: Carla Bongioanni (VP. de Banca Internacional)
CC: Krivoy, Clara
Asunto: RE: Lehman Brothers - Registration of claims

Gracias Carla. En atencion al deadline y dado que tienen este nuevo numero, les recomiendo llamar por telefono al siguiente numero a ver si los pueden ayudar mas rapido:

+1 646 835 5400.

Saludos,
Patricia

Patricia Silberman | Associate
Chadbourne & Parke LLP
30 Rockefeller Plaza, New York, NY 10112
tel 212-408-5563 | fax 646-710-5563
psilberman@chadbourne.com | <http://www.chadbourne.com>
vCard: <http://www.chadbourne.com/vcard/psilberman.vcf>

Please consider the environment before printing this email.

From: Carla Bongioanni (VP. de Banca Internacional) [<mailto:cbongioanni@bancocanarias.com>]
Sent: Tuesday, October 20, 2009 12:05 PM
To: corporate_actions@euroclear.com
Cc: Silberman, Patricia
Subject: RV: Lehman Brothers - Registration of claims
Importance: High

Good morning,

Please find below the information from our attorney in New York, regarding our account with your Institution. We have been informed by your Customer Service in Belgique that the account number which we are searching for to obtain the blocking number (940-90592) is not a valued number; however, according to our files we have another number, which is 940-90590. Would you please check ASAP this account number and let me know if this number belongs to Banco Canarias de Venezuela Banco Universal, C.A.? The request of this information is due to the dead line of October 23, 2009, to obtain the blocking number.

Thanks in advance for your prompt response.

Best regards,

Carla M. Bongioanni R.
Vicepresidente Banca Internacional
VP Finanzas
Banco Canarias de Venezuela Banco Universal, C.A.
email: cbongioanni@bancocanarias.com
Tel: +58212 210 1135
Fax: +58212 210 1105

De: Cesamar Briceño
Enviado el: Lunes, 19 de Octubre de 2009 09:00 a.m.
Para: Carla Bongioanni (VP. de Banca Internacional)
CC: Rita M. Mulkay
Asunto: RV: Lehman Brothers - Registration of claims

Buenos días Sra. Carla,

Ajunto correo enviado por el Sr. Angel Meza.

Saludos,

Cesamar Briceño
Asistente VP Ejecutivo
Banco Canarias
cbriceno@bancocanarias.com

www.bancocanarias.com.ve

Telf: +58 (212) 210.10.19

Fax: +58 (212) 956.95.30

-----Mensaje original-----

De: Angel Meza [mailto:edelbas@gmail.com]

Enviado el: Lunes, 19 de Octubre de 2009 08:42 a.m.

Para: joanna.pino@yahoo.com; Cesamar Briceño

Asunto: Fwd: Lehman Brothers - Registration of claims

Cesamar:

Por favor hazle llegar este email a Carla Bongiani para que nos ayude con el swift que necesitamos transmitir a Euroclear segun el email anexo y entregue a Alvaro una copia cuando llegue.

Gracias

Angel Meza

----- Forwarded message -----

From: Silberman, Patricia <PSilberman@chadbourne.com>

Date: 2009/10/16

Subject: RE: Lehman Brothers - Registration of claims

To: "ameza@bancocanarias.com" <ameza@bancocanarias.com>, "edelbas@gmail.com" <edelbas@gmail.com>

Cc: "Krivoy, Clara" <CKrivoy@chadbourne.com>, "Aryani, Lara" <LAryani@chadbourne.com>

Estimado Angel,

Te adjunto e-mail preparado por nuestro grupo de bankruptcy relativo al procedimiento que hay que seguir para obtener el blocking number de manera de poder registrar el claim respecto a las notas de Banco Canarias. Como se explica en el mail, nosotros no podemos obtener dicho numero por ustedes por lo que ustedes deben contactar directamente a Euroclear. Les pido nos envíen a la brevedad dicho blocking number asi como el amount de los claims al 15 de septiembre de 2008 para poder registrar el claim a tiempo. Saludos, Patricia

In order to file the proof of claims relating to your Lehman notes, you must obtain a blocking reference number for each of these notes. We are unfortunately not authorized to apply for these numbers on your behalf. The application process will require you to send particular banking instructions to Euroclear, the depository that is holding your notes.

The deadline for requesting these blocking numbers is 5:00 p.m. Eastern Standard Time, October 23, 2009—a week from today. You cannot file a claim without a blocking number, so it is absolutely critical that you request the number before the deadline.

To apply to Euroclear, please send them a Euclid instruction type 37 or a Swift instruction type 553 requesting the blocking numbers for each of your notes. Any additional information you require to send these instructions should be on the notification you received from Euroclear, and you can also contact Euroclear directly at +1 646 835 5400.

Below is a chart with some of the information we have regarding your eligible notes. For your reference only, we have included the value of the notes earlier this year, but this is outdated information. Please calculate and add the value of the claim as of September 15, and confirm all other information in

the chart before sending your instructions, including that the list is complete and contains all the notes that you own.

Entity	Depository	Account No.	CUSIP/ISIN	Claim Value as in our outdated records	Claim Value as of September 15, 2008
Banco Canarias	Euroclear	940-90592	XS0295087042	VEF 537,500,000 or VEB 537,500,000,000	Please Add
Banco Canarias	Euroclear	940-90592	XS0258731909	VEF 306,375,000 or VEB 537,500,000,000	Please Add

From: Silberman, Patricia
Sent: Wednesday, October 07, 2009 1:51 PM
To: 'Leonardo Romay'
Cc: dpalmar@bancocanarias.com; Krivoy, Clara; Barredo, Nilo
Subject: RE: Lehman Brothers - Registration of claims

Leonardo,

Estamos ahora en el proceso de registrar los claims relativos a los Lehman Brothers Treasury Notes. Para esos efectos, necesitamos completar el cuadro que a continuacion te adjunto. Si bien, tenemos parte de la informacion que se requiere en este cuadro, mucho agradeceriamos si nos puedes otorgar la informacion relativa al blocking number de las notas de Banco Canarias. Si no tuvieras como obtener dicha informacion, nosotros contactariamos al depositario correspondiente para solicitarla. Quedo a tu disposicion frente a cualquier pregunta o comentario. Gracias, Patricia

Issuer	Description of Security	ISIN	Blocking Number	Account Number	A

Patricia Silberman | Associate
Chadbourne & Parke LLP
30 Rockefeller Plaza, New York, NY 10112
tel 212-408-5563 | fax 646-710-5563
psilberman@chadbourne.com | <http://www.chadbourne.com>
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Exhibit H

Aryani, Lara

From: Susanin, Audrey [audrey.susanin@weil.com]
Sent: Thursday, October 22, 2009 1:23 PM
To: Aryani, Lara
Cc: Lehman Team
Subject: Lehman Inquiry

Follow Up Flag: Follow up
Flag Status: Flagged

Lara,

We saw that you had contacted Epiq Systems on October 21, 2009 and had a question regarding Lehman Brothers. You may direct your inquiry to lehmanteam@weil.com.

Regards,
Audrey

Audrey Susanin
Weil, Gotshal & Manges LLP
767 Fifth Avenue
New York, NY 10153
Tel: (212) 310-8413

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Exhibit I

Aryani, Lara

From: Quaglia, Mark [mark.quaglia@lehman.com]
Sent: Friday, October 23, 2009 8:59 AM
To: Carla Bongioanni (VP. de Banca Internacional)
Cc: Silberman, Patricia; Aryani, Lara
Subject: RE: RV: Lehman Brothers - Registration of claims

Follow Up Flag: Follow up
Flag Status: Flagged

Hi Lara, Carla and Patricia,

If you have a Eur MTN that is on the list of Lehman Program Securities on the Bar Date Memorandum then the protocol would be to contact the clearing agency, (e.g. Euroclear/Clearstream) to obtain the blocking #. If you do not have an inroad to the clearing agency then the broker from whom you purchased the security or your current broker should be able to procure your blocking #.

Please let me know if this helps and if not give me a call and I can try to chase down the answer for you.

Best,
Mark

Mark B. Quaglia
Lehman Brothers
1271 Sixth Avenue-40th Floor
New York, NY 10020
Tel: (646) 333-8772
Fax: (212) 519-1922

From: Carla Bongioanni (VP. de Banca Internacional) [mailto:cbongioanni@bancocanarias.com]
Sent: Wednesday, October 21, 2009 4:02 PM
To: Quaglia, Mark
Cc: PSilberman@chadbourne.com
Subject: RE: RV: Lehman Brothers - Registration of claims

Hi Mark

We're talking about the Notes that we have in LB.

Patricia, could you please explain to Mark

Thanks

Carla M. Bongioanni R.
Vicepresidente Banca Internacional
VP Finanzas
Banco Canarias de Venezuela Banco Universal, C.A.
email: cbongioanni@bancocanarias.com
Tel: +58212 210 1135
Fax: +58212 210 1105

De: Quaglia, Mark [mailto:mark.quaglia@lehman.com]
Enviado el: Miércoles, 21 de Octubre de 2009 02:41 p.m.
Para: Carla Bongioanni (VP. de Banca Internacional)
CC: PSilberman@chadbourne.com
Asunto: Re: RV: Lehman Brothers - Registration of claims

Hi Carla,

Can you clarify what you mean by "blocking number".

Best,
Mark

From: Carla Bongioanni (VP. de Banca Internacional)
To: Quaglia, Mark
Cc: Silberman, Patricia
Sent: Wed Oct 21 14:58:18 2009
Subject: RV: Lehman Brothers - Registration of claims
Dear Mark:

I have been referred to you by Noel Brennan, from Mission Capital, as we need ASAP the blocking number for each one of the Lehman notes in the name of Banco Canarias de Venezuela Banco Universal, C.A.

I would appreciate very much your prompt response to this matter.

Best regards,

Carla M. Bongioanni R.
Vicepresidente Banca Internacional
VP Finanzas
Banco Canarias de Venezuela Banco Universal, C.A.
email: cbongioanni@bancocanarias.com
Tel: +58212 210 1135
Fax: +58212 210 1105

De: Silberman, Patricia [mailto:PSilberman@chadbourne.com]
Enviado el: Martes, 20 de Octubre de 2009 12:50 p.m.
Para: Carla Bongioanni (VP. de Banca Internacional)
CC: Krivoy, Clara; Aryani, Lara
Asunto: RE: Lehman Brothers - Registration of claims

La informacion la sacamos de los antecedentes proporcionados por Canarias. Les adjunto documento al respecto.

Gracias,
Patricia

Patricia Silberman | Associate
Chadbourne & Parke LLP
30 Rockefeller Plaza, New York, NY 10112
tel 212-408-5563 | fax 646-710-5563
psilberman@chadbourne.com | <http://www.chadbourne.com>
vCard: <http://www.chadbourne.com/vcard/psilberman.vcf>

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From: Carla Bongioanni (VP. de Banca Internacional) [mailto:cbongioanni@bancocanarias.com]
Sent: Tuesday, October 20, 2009 12:58 PM
To: Silberman, Patricia
Subject: RE: Lehman Brothers - Registration of claims
Importance: High

Patricia, dice Carla que Euroclear le informa que esos números no existen, que de donde usted los obtuvo.

Saludos,

Rita

Carla M. Bongioanni R.
Vicepresidente Banca Internacional
VP Finanzas
Banco Canarias de Venezuela Banco Universal, C.A.
email: cbongioanni@bancocanarias.com
Tel: +58212 210 1135
Fax: +58212 210 1105

De: Silberman, Patricia [mailto:PSilberman@chadbourne.com]
Enviado el: Martes, 20 de Octubre de 2009 11:46 a.m.
Para: Carla Bongioanni (VP. de Banca Internacional)
CC: Krivoy, Clara
Asunto: RE: Lehman Brothers - Registration of claims

Gracias Carla. En atencion al deadline y dado que tienen este nuevo numero, les recomiendo llamar por telefono al siguiente numero a ver si los pueden ayudar mas rapido:

+1 646 835 5400.

Saludos,
Patricia

Patricia Silberman | Associate
Chadbourne & Parke LLP
30 Rockefeller Plaza, New York, NY 10112
tel 212-408-5563 | fax 646-710-5563
psilberman@chadbourne.com | <http://www.chadbourne.com>
vCard: <http://www.chadbourne.com/vcard/psilberman.vcf>

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From: Carla Bongioanni (VP. de Banca Internacional) [mailto:cbongioanni@bancocanarias.com]
Sent: Tuesday, October 20, 2009 12:05 PM
To: corporate_actions@euroclear.com
Cc: Silberman, Patricia

Subject: RV: Lehman Brothers - Registration of claims
Importance: High

Good morning,

Please find below the information from our attorney in New York, regarding our account with your Institution. We have been informed by your Customer Service in Belgique that the account number which we are searching for to obtain the blocking number (940-90592) is not a valued number; however, according to our files we have another number, which is 940-90590. Would you please check ASAP this account number and let me know if this number belongs to Banco Canarias de Venezuela Banco Universal, C.A.? The request of this information is due to the dead line of October 23, 2009, to obtain the blocking number.

Thanks in advance for your prompt response.

Best regards,

Carla M. Bongioanni R.
Vicepresidente Banca Internacional
VP Finanzas
Banco Canarias de Venezuela Banco Universal, C.A.
email: cbongioanni@bancocanarias.com
Tel: +58212 210 1135
Fax: +58212 210 1105

De: Cesamar Briceño
Enviado el: Lunes, 19 de Octubre de 2009 09:00 a.m.
Para: Carla Bongioanni (VP. de Banca Internacional)
CC: Rita M. Mulkay
Asunto: RV: Lehman Brothers - Registration of claims

Buenos días Sra. Carla,

Ajunto correo enviado por el Sr. Angel Meza.

Saludos,

Cesamar Briceño
Asistente VP Ejecutivo
Banco Canarias
cbriceno@bancocanarias.com
www.bancocanarias.com.ve
Telf: +58 (212) 210.10.19
Fax: +58 (212) 956.95.30

-----Mensaje original-----

De: Angel Meza [mailto:edelbas@gmail.com]
Enviado el: Lunes, 19 de Octubre de 2009 08:42 a.m.
Para: joanna.pino@yahoo.com; Cesamar Briceño
Asunto: Fwd: Lehman Brothers - Registration of claims

Cesamar:

Por favor hazle llegar este email a Carla Bongiani para que nos ayude con el swift que necesitamos transmitir a Euroclear segun el email anexo y entregue a Alvaro una copia cuando llegue.

Gracias

Angel Meza

----- Forwarded message -----

From: **Silberman, Patricia** <PSilberman@chadbourne.com>

Date: 2009/10/16

Subject: RE: Lehman Brothers - Registration of claims

To: "ameza@bancocanarias.com" <ameza@bancocanarias.com>, "edelbas@gmail.com" <edelbas@gmail.com>

Cc: "Krivoy, Clara" <CKrivoy@chadbourne.com>, "Aryani, Lara" <LAryani@chadbourne.com>

Estimado Angel,

Te adjunto e-mail preparado por nuestro grupo de bankruptcy relativo al procedimiento que hay que seguir para obtener el blocking number de manera de poder registrar el claim respecto a las notas de Banco Canarias. Como se explica en el mail, nosotros no podemos obtener dicho numero por ustedes por lo que ustedes deben contactar directamente a Euroclear. Les pido nos envíen a la brevedad dicho blocking number asi como el amount de los claims al 15 de septiembre de 2008 para poder registrar el claim a tiempo. Saludos, Patricia

In order to file the proof of claims relating to your Lehman notes, you must obtain a blocking reference number for each of these notes. We are unfortunately not authorized to apply for these numbers on your behalf. The application process will require you to send particular banking instructions to Euroclear, the depository that is holding your notes.

The deadline for requesting these blocking numbers is 5:00 p.m. Eastern Standard Time, October 23, 2009--a week from today. You cannot file a claim without a blocking number, so it is absolutely critical that you request the number before the deadline.

To apply to Euroclear, please send them a Euclid instruction type 37 or a Swift instruction type 553 requesting the blocking numbers for each of your notes. Any additional information you require to send these instructions should be on the notification you received from Euroclear, and you can also contact Euroclear directly at +1 646 835 5400.

Below is a chart with some of the information we have regarding your eligible notes. For your reference only, we have included the value of the notes earlier this year, but this is outdated information. Please calculate and add the value of the claim as of September 15, and confirm all other information in the chart before sending your instructions, including that the list is complete and contains all the notes that you own.

Entity	Depository	Account No.	CUSIP/ISIN	Claim Value as in our outdated records	Claim Value as of September 15, 2008
Banco Canarias	Euroclear	940-90592	XS0295087042	VEF 537,500,000 or VEB 537,500,000,000	<i>Please Add</i>
Banco Canarias	Euroclear	940-90592	XS0258731909	VEF 306,375,000 or VEB 537,500,000,000	<i>Please Add</i>

From: Silberman, Patricia

Sent: Wednesday, October 07, 2009 1:51 PM

To: 'Leonardo Romay'

Cc: dpalmar@bancocanarias.com; Krivoy, Clara; Barredo, Nilo

Subject: RE: Lehman Brothers - Registration of claims

Leonardo,

Estamos ahora en el proceso de registrar los claims relativos a los Lehman Brothers Treasury Notes. Para esos efectos, necesitamos completar el cuadro que a continuacion te adjunto. Si bien, tenemos parte de la informacion que se requiere en este cuadro, mucho agradeceriamos si nos puedes otorgar la informacion relativa al blocking number de las notas de Banco Canarias. Si no tuvieras como obtener dicha informacion, nosotros contactariamos al depositario correspondiente para solicitarla. Quedo a tu disposicion frente a cualquier pregunta o comentario. Gracias, Patricia

Issuer	Description of Security	ISIN	Blocking Number	Account Number	A

Patricia Silberman | Associate
Chadbourne & Parke LLP
30 Rockefeller Plaza, New York, NY 10112
tel 212-408-5563 | fax 646-710-5563
psilberman@chadbourne.com | <http://www.chadbourne.com>
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Exhibit J

Aryani, Lara

From: Aryani, Lara
Sent: Thursday, October 29, 2009 6:10 PM
To: 'Marybeth.Reid@barclayscapital.com'
Cc: jonathan.morris@barclayswealth.com; Rivera, Christy
Subject: RE: Request for Contacts at Barclays Capital

Follow Up Flag: Follow up
Flag Status: Flagged

Marybeth,

Thanks very much, we will be in touch with Jonathan Morris soon.

Best,
Lara

Lara Aryani
Chadbourne & Parke LLP
30 Rockefeller Plaza, New York, NY 10112
tel 212-408-5243 | fax 646-710-5243
laryani@chadbourne.com | <http://www.chadbourne.com>
vCard: <http://www.chadbourne.com/vcard/laryani.vcf>

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From: Marybeth.Reid@barclayscapital.com [<mailto:Marybeth.Reid@barclayscapital.com>]
Sent: Thursday, October 29, 2009 6:08 PM
To: Aryani, Lara
Cc: jonathan.morris@barclayswealth.com
Subject: RE: Request for Contacts at Barclays Capital

HI -Please feel free to contact Jonathan Morris at 212-526-1614

Tks
MB

From: Aryani, Lara [<mailto:Laryani@chadbourne.com>]
Sent: Thursday, October 29, 2009 3:49 PM
To: Clinton, Matthew: EMG Mkts Trading (NYK)
Cc: Rivera, Christy
Subject: Request for Contacts at Barclays Capital

Matthew,

As discussed a earlier over the phone, we are trying to assist our client Banesco who is trying to confirm that an account he had with Lehman Brothers Inc. has been converted into an institutional account with Barclays Capital. We would greatly appreciate any referrals you might have for anyone at Barclays Capital who is able to assist. Thank you.

Regards,

Lara Aryani
Chadbourne & Parke LLP
30 Rockefeller Plaza, New York, NY 10112
tel 212-408-5243 | fax 646-710-5243
laryani@chadbourne.com | <http://www.chadbourne.com>
vCard: <http://www.chadbourne.com/vcard/laryani.vcf>

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EXHIBIT E

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re: : Chapter 11 Case No.
: :
LEHMAN BROTHERS HOLDINGS INC., et al. : 08-13555 (JMP)
: :
Debtors. : (Jointly Administered)

DECLARATION OF CHRISTY RIVERA

I, CHRISTY RIVERA, declare and state as follows:

1. I am counsel at the law firm of Chadbourne & Parke LLP. Except where indicated below, I make this declaration on my personal knowledge and could competently testify to the matters set forth herein, if necessary.

2. I assisted in the preparation of certain proofs of claim required to be filed pursuant to that Order Establishing the Deadline for Filing Proofs of Claim, Approving the Form and Manner of Notice Thereof and Approving the Proof of Claim Form (the "LBHI Bar Date Order") [Docket No. 4271].

3. Several of Chadbourne's clients held their Lehman Program Securities (as defined in the Order) custodied in accounts at Lehman Brothers Inc. ("LBI"). In connection with trying to obtain Blocking Numbers for the Debtors' request for Blocking Numbers, I contacted Bill Hennessey at Hughes Hubbard & Reed LLP ("Hughes Hubbard"), several times with questions. Mr. Hennessey was a former Chadbourne colleague of mine and was helpful in pointing me in the right direction on occasion. I spoke with Mr. Hennessey several times in connection with preparing proofs of claim to be filed against Lehman Brothers Holdings Inc. ("LBHI") although I do not remember the actual dates of the conversations. The point of the

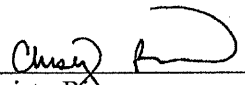
calls was to see if Mr. Hennessey or someone at Hughes Hubbard could identify someone our clients could contact in order to obtain Blocking Numbers (as defined in the Order). Mr. Hennessey told me that he did not know anyone we could contact, and he told me he had asked around and no one he spoke with could address the Blocking Number issue. Given the nature of the Blocking Number request, he suggested that we do as directed by the LBI website and contact Epiq.

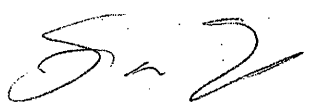
4. A colleague of mine, Lara Aryani, had been speaking with Epiq representatives so I advised her to continue trying to obtain Blocking Number information through someone through Epiq.

5. After learning that clients were continuing to have difficulty obtaining Blocking Numbers from LBI, on October 23 2009, I again called Mr. Hennessey, but he was still unable to provide any assistance.

6. On October 26, 2009, I sent Mr. Hennessey an email asking that he confirm whether there was anyone I should be speaking with at Hughes Hubbard or Epiq Systems, Inc. ("Epiq"). In response to my email, Mr. Hennessey called me and confirmed that inquiries for Blocking Numbers should be directed to Epiq.

Dated: New York, New York
October 27, 2011


Christy Rivera


FRANCISCO VAZQUEZ
Notary Public, State of New York
No. 02148072000
Qualified in New York County
Commission Expires Dec. 27, 2014